ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P. O. Box 241
Baton Rouge, LA 70821-0241

ExxonMobil Chemical

Certified Mail **7019 0700 0000 8735 5260**
February 18, 2022

ExxonMobil Baton Rouge Chemical Plant
ExxonMobil Chemical Company Flare Consent Decree Semi-Annual Report
LDEQ Agency Interest No. 286

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave, N.W.
William Jefferson Clinton Building
Room 1119
Washington, DC 20460-0001

Attention: Consent Decree, Civil Action No. 4:17-cv-3302

Pursuant to Section X, Paragraphs 66-73 of Consent Decree, Civil Action No. 4:17-cv-3302, Exxon Mobil Corporation submits this Semi-Annual Report (SAR) covering the period of July 1, 2021 through December 31, 2021.

Certification Statement
Per Consent Decree Paragraph 71:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions about this SAR or require any additional information, please contact Denée Elwood at 225-540-1188.

Sincerely,

Dave Luecke
Baton Rouge Chemical Plant Site Manager
ExxonMobil Baton Rouge Chemical Plant

CP 1.1.09.22.001

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P. O. Box 241
Baton Rouge, LA 70821-0241

cc:

EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington D.C. 20044-7611
Re: DJ # 90-5-2-1-10128 AND 10128/1
CERTIFIED **7019 0700 0000 8735 5277**

United States Attorney
Southern District of Texas
Andrew A. Bobb
Assistant U.S. Attorney
1000 Louisiana St., Suite 2300
Houston, TX 77002
CERTIFIED **7019 0700 0000 8735 5284**

Associate Director
Air, Toxics, and Inspections Coordination
Branch (6 EN-A)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Mail Code 6AR
Dallas, Texas 75270-2102
CERTIFIED **7019 0700 0000 8735 5291**

Celena J. Cage
Administrator, Enforcement Division
Office of Environmental Compliance
Louisiana Department of Environmental Quality
P.O. Box 4312
Baton Rouge, Louisiana 70821-4312
CERTIFIED **7019 0700 0000 8735 5307**

Electronic Copies:

Robert Parrish, EPA (email only; parrish.robert@epa.gov)
Patrick Foley, EPA (email only; foley.patrick@epa.gov)
Margaret Osbourne, EPA Region 6 (email only; osbourne.margaret@epa.gov)
EES Case Management Unit, (eescdcopy.enrd@usdoj.gov)

Baton Rouge Chemical Plant

Baton Rouge, Louisiana

SEMI-ANNUAL REPORT
PURSUANT TO CONSENT DECREE,
***UNITED STATES, ET AL V. EXXON MOBIL CORPORATION AND EXXONMOBIL OIL CORPORATION*,**
CIVIL ACTION NO. 4:17-cv-3302 (S.D. TX)

July 1, 2021 – December 31, 2021

4999 Scenic Highway

Baton Rouge, Louisiana

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SECTION 1 STATUS OF CONSENT DECREE SECTION V COMPLIANCE REQUIREMENTS

This progress report provides the status of implementation of Consent Decree requirements that, during the reporting period, require the ExxonMobil Baton Rouge Chemical Plant to undertake a specific action or make a submittal to an agency; or otherwise require the ExxonMobil Baton Rouge Chemical Plant to take specific steps to implement new obligations, including new control or emissions requirements, new monitoring requirements, or institution of new procedures. Once the ExxonMobil Baton Rouge Chemical Plant has reported a requirement as implemented, it will not appear in subsequent progress reports under this subparagraph.

Consent Decree Paragraph 66a. – b.

a. A description of the status of work performed and progress made toward implementing all requirements of Consent Decree Section V (Compliance Requirements) at the Covered Facilities. This topic should describe any major milestones completed and remaining to be completed;

ExxonMobil Baton Rouge Chemical Plant has completed the following work required to meet the requirements of Consent Decree Section V Compliance Requirements. Major milestones completed for this reporting period are in Table 1.1.

TABLE 1.1 Major Milestones Completed For This Reporting Period

Applicability	Description of Work Completed During This Reporting Period	Completion Date
None	None	None

ExxonMobil Baton Rouge Chemical Plant does not have any remaining work required to meet the Consent Decree Section V Compliance Requirements for this reporting period, as noted by "None" in Table 1.2.

TABLE 1.2 Status of Remaining Work to be Completed

Applicability	Remaining Work To Be Completed	Anticipated Completion Date
None	None	None

b. A description of any problems encountered or anticipated in meeting the requirements in Consent Decree Section V (Compliance Requirements) at the Covered Facilities, together with implemented or proposed solutions;

ExxonMobil Baton Rouge Chemical Plant has not encountered nor anticipates problems in meeting the requirements of Consent Decree Section V Compliance Requirements as indicated by "None" in Table 1.3.

TABLE 1.3 Encountered or Anticipated Problems In Work To be Completed

Covered Flare	Encountered or Anticipated Problem(s)	Proposed or Implemented Solution(s)
None	None	None

SECTION 2 STATUS OF CONSENT DECREE SECTION V REPORTING REQUIREMENTS

Below is a summary of the status of reports as required under Consent Decree Section V.

Flare Data and Monitoring Systems and Protocol Report
Requirement: CD Paragraph 18
Description: For each Covered Flare, by no later than 365 Days after the Effective Date, the Defendants must submit a report, consistent with the requirements in Appendix 1.5, to EPA that includes the following:

a. The information, diagrams, and drawings specified in Paragraphs 1–7 of Appendix 1.5;
b. A detailed description of each instrument and piece of monitoring equipment, including the specific model and manufacturer, that the Defendants have installed or will install in compliance with Paragraphs 20–24 of this Consent Decree (Paragraphs 8–9 of Appendix 1.5); and
c. A narrative description of the monitoring methods and calculations that the Defendants will use to comply with the requirements of Paragraph 43 (Paragraph 10 of Appendix 1.5).

Status: The Flare Data and Monitoring Systems and Protocol Report was submitted on June 6, 2019.

Initial Waste Gas Minimization Plan ("Initial WGMP")
Requirement: CD Paragraph 29
Description: By no later than 365 Days after the Effective Date, for each Covered Flare, the Defendants must submit to EPA an Initial Waste Gas Minimization Plan that discusses and evaluates flaring Prevention Measures on both a facility-wide and Covered Flare-specific basis for each Covered Facility.

Status: The Initial Waste Gas Minimization Plan was submitted on June 6, 2019.

First Updated Waste Gas Minimization Plan ("First Updated WGMP")
Requirement: CD Paragraph 30
Description: By no later than 730 Days after the Effective Date, the Defendants must submit to EPA a First Updated WGMP that updates, if and as necessary, the information, diagrams, and drawings required in the Flare Data and Monitoring Systems and Protocol Report required by Paragraph 18 and the information required in sub-Paragraphs 29.a–29.e for the 12-month period after the period covered by the Initial Waste Gas Minimization Plan.

Status: The First Updated Waste Gas Minimization Plan was submitted on June 5, 2020.

SECTION 3 STATUS OF PERMITTING ACTIVITY

Consent Decree Paragraph 66c.

c. A description of the status of any permit applications, including a summary of all permitting activity, pertaining to compliance with this Consent Decree;

Status: ExxonMobil Baton Rouge Chemical Plant submitted two permit applications to the Louisiana Department of Environmental Quality's (LDEQ's) consolidated preconstruction and Title V Clean Air Act (CAA) permitting program for Permit 2390-V4 and Permit 2365-V7 on May 29, 2019. The applications requested to incorporate the requirements listed in the Consent Decree sub-Paragraph 60.c into Permit 2390-V4 and Permit 2365-V7 such that the requirements will (i) become and remain "applicable requirements" as that term is defined in 40 C.F.R §70.2 and (ii) survive the termination of the Consent Decree. LDEQ approved and issued Permit 2390-V5 and Permit 2365-V8 to ExxonMobil Baton Rouge Chemical Plant on September 26, 2019 and November 1, 2019.

Consent Decree Paragraph 66d.

d. A copy of any reports that were submitted only to LDEQ and that pertain to compliance with this Consent Decree.

Status: ExxonMobil Baton Rouge Chemical Plant is providing reports that may pertain to compliance with this Consent Decree and that were submitted only to the LDEQ in Attachment B of this report.

Consent Decree Paragraph 66e.

e. A description of the Defendants' progress in satisfying its obligations in connection with the SEP(s) under Section VI including, at a minimum, a narrative description of activities undertaken; status of any construction or compliance measures, including the completion of any milestones set forth in the SEP Work Plan (attached as Appendix 2.1), and a summary of costs incurred since the previous report;

Status: The Louisiana Beneficial Environmental Projects (BEPs) have been completed. Refer to the 2H2019 Semi-Annual Report submitted by the ExxonMobil Baton Rouge Chemical Plant on February 26, 2020 for supporting information and documentation.

The Baytown Area Phyto-Pollution Reduction Supplemental Environmental Project (SEP) has been completed. Refer to the 2H2020 Semi-Annual Report submitted by the ExxonMobil Baytown Chemical Plant on February 25, 2021 for supporting information and documentation.

SECTION 6 UPDATED WASTE GAS MINIMIZATION PLAN (WGMP)

Consent Decree Paragraph 66f.

f. Any updated WGMP for the Covered Facilities that is required to be submitted by Paragraph 31.

Subsequent Updates to WGMPs ("Subsequently Updated WGMP")
Requirement: CD Paragraph 31
On an annual basis after submitting the First Updated WGMP until termination of the Decree, the Defendants must submit an updated WGMP for a Covered Facility as part of the Semi-Annual Report required by Section IX (Reporting Requirements) if, at that Covered Facility, the Defendants: a) commence operation of a Newly Installed Covered Flare or permanently remove a Covered Flare from service, b) connect a new Waste Gas stream to a Covered Flare, c) intentionally modify the Baseload Waste Gas Flow Rate to a Covered Flare, d) install additional FGRS, or e) change the design of a Covered Flare. Each update must update, if and as necessary, the information required in sub-Paragraphs 29.a.i - 29.a.iii. Each update must update, if and as necessary, the information required in sub-Paragraphs 30.a and 30.b. To the extent the Defendants propose to extend any schedule set forth in a previous WGMP for any of the Covered Facilities, the Defendants may do so only with good cause, the determination of which is subject to Section XII (Dispute Resolution).

Status: The Initial Waste Gas Minimization Plan was submitted on June 6, 2019. The first Updated Waste Gas Minimization Plan was submitted on June 5, 2020. ExxonMobil Baton Rouge Chemical Plant made minor subsequent updates to the Updated WGMP tables and schematics in the 1H2021 Semi-Annual Report submitted on August 27, 2021. Subsequent updates, if necessary, will be made on an annual basis as part of the Semi-Annual Report.

SECTION 7 SUMMARY OF INTERNAL FLARING INCIDENT REPORTS

Consent Decree Paragraph 66g.

g. Any summary of internal flaring incident reports as required by Paragraph 34.

Submitting Summary of Internal Flaring Incident Reports
Requirement: CD Paragraph 34b.
In each Semi-Annual Report due under Section IX (Reporting Requirements), the Defendants must include a summary of the following items for each Reportable Flaring Incident that occurred during the six-month period that the Semi-Annual Report covers:

i. Date;
ii. Duration;
iii. Amount of VOCs and HAPs emitted;
iv. Root cause(s);
v. Corrective action(s) completed;
vi. Corrective action(s) still outstanding; and
vii. An analysis of any trends identified by the Defendants in the number of Reportable Flaring Incidents, the root causes, or the types of corrective action(s).

Status: In accordance with Paragraph 34a. of the Consent Decree, ExxonMobil Baton Rouge Chemical Plant began monitoring for Reportable Flaring Incidents (RFIs) on June 6, 2019. A summary of RFIs that occurred from July 1, 2021 through December 31, 2021 are provided in Table 7.1.

TABLE 7.1 July 1, 2021 through December 31, 2021
Summary of Internal Flaring Incident Reports

Date	Duration, *Hours*	Amount Emitted	
		VOCs	HAPs
7/4/2021 16:42– 7/10/2021 15:33	142.9	11,902.5 lbs	845.8 lbs
Covered Flares(s)	Flare 10, Flare 25, Flare 26		
Root Cause	The Baton Rouge Chemical Plant (BRCP) South Area Control Center (SACC) Main Train process gas compressor tripped due to wet steam. This trip led to increased flaring until KJT-01 and KLT-01 units in SACC were put back into service and no longer fed to the flare.		

	The root cause of the compressor trip was failed steam traps on the compressor steam line.
Corrective Action(s) Completed	The failed steam traps were replaced.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
7/18/2021 22:35–7/28/2021 02:01	219.4	653.1 lbs	34.5 lbs
Covered Flares(s)	Flare 10 and Flare 25		
Root Cause	According to normal maintenance protocol, Flare Gas Compressor B (C-101B) underwent an overhaul. This overhaul consisted of planned, routine maintenance and replacement activities. Without the recovery capabilities of C-101B, BRCP had to flare material that would normally be recovered causing a reportable RFI.		
Corrective Action(s) Completed	Completed the Flare Gas Compressor B overhaul and the compressor was returned to service.		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/10/2021 8:21–8/11/2021 8:18	23.9	96.1 lbs	5.8 lbs
Covered Flares(s)	Flare 25		
Root Cause	On August 10th, BRCP Flare Gas Compressor B (C-101B) automatically shut down due to a safety mechanism on the compressor. This automatic shutdown occurred in order to prevent permanent damage to the machine. Without the recovery capabilities of C-101B due to the shutdown, BRCP had to flare material that would normally be recovered resulting in an RFI. The root cause of the RFI was a plugged orifice which caused the compressor shutdown.		

Corrective Action(s) Completed	Unplugged the orifice and restarted Flare Gas Compressor B.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/13/2021 13:16–8/13/2021 22:14	8.96	103.9 lbs	5.4 lbs
Covered Flares(s)	Flare 25		
Root Cause	On August 13th, the Halobutyl unit (RLA-1) and Butadiene Extraction Unit of Louisiana (BELA) at BRCP had coinciding safety flaring incidents. "Safety flaring" includes unavoidable flaring required for safe and reliable operation and maintenance of the facility. RLA-1 had a drier regeneration which increased the rate of their safety flaring while BELA was flaring simultaneously. The root cause of the RFI was the concurrent safety flaring from both BELA and RLA-1 occurring at the same time.		
Corrective Action(s) Completed	No corrective action required, both streams were routed to the flare for safety flaring reasons.		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/22/2021 11:30–8/23/2021 13:58	26.5	262.8 lbs	0.0
Covered Flares(s)	Flare 10 and Flare 25		
Root Cause	On August 22nd during shutdown of the Diolefin Extraction Louisiana (DILA) unit activities, operations noticed an increased fill rate in the #10 flare knock out drum. Troubleshooting and subsequent investigation resulted in the discovery of an open valve on a pump vent line to the flare header, which was promptly closed. The root cause of the RFI was the inadvertent opening of a valve on a vent line to the flare header.		

Corrective Action(s) Completed	The vent valve was closed.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/23/2021 13:30–8/24/2021 8:00	18.5	33.9 lbs	1.9 lbs
Covered Flares(s)	Flare 7		
Root Cause	During mechanical inspection, it was determined that the pipe wall thickness on a portion of the recycled syn-gas line needed to be removed from service for continued safe operation. Due to this issue, the OXO unit was immediately squatted. The piping was blinded and is no longer in service. The gas remaining in the unit while squatting needed to be relieved which led to the RFI. The OXO unit squat to bypass the piping was the cause of the RFI.		
Corrective Action(s) Completed	The unit squat was completed was returned to service after piping was bypassed/isolated.		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/26/2021 16:27–8/27/2021 15:03	22.6	44.8 lbs	2.9 lbs
Covered Flares(s)	Flare 10, Flare 25, and Flare 26		
Root Cause	On August 26th, a pressure instrument (QLCP577) failed and incorrectly showed a high pressure. An upstream control valve (LCP577V) meant to control QLCP577 to a set-point, closed due to the high pressure reading. After determining the failed pressure instrument was the root cause, butane was reintroduced to the process by manually opening the upstream control valve LCP577V. This		

	feed/pressure swing caused excess gas in the Primary Fractionators and Butane Header which needed to be relieved to the flare. The excess relieving to the flare caused increased flaring and resulted in an RFI. The QLCP577 pressure instrument failure was the root cause of the RFI.
Corrective Action(s) Completed	Repaired the pressure instrument QLCP577.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
8/28/2021 14:15–9/03/2021 11:21	141.1	1,810.7 lbs	62.3 lbs
Covered Flares(s)	Flare 25 and Flare 26		
Root Cause	From August 28th to September 3rd, Hurricane Ida had significant impacts on the Louisiana coastline and in Baton Rouge. The BRCP was aware of the incoming storm and took action to minimize adverse impacts to equipment and personnel, following extensive hurricane preparation guidelines. During these preparations, multiple units were shut down before the hurricane arrived. As part of their shut down procedures, these units need to purge to the flare. These increased purges to the flare cause additional flaring which resulted in an RFI. The root cause of the RFI was shutdown of the units in advance of Hurricane Ida.		
Corrective Action(s) Completed	None – Force Majeure event		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
9/11/2021 21:04–9/29/2021 20:35	431.5	14,943 lbs	273.0 lbs
Covered Flares(s)	Flare 10, Flare 25, and Flare 26		

Root Cause	The Baton Rouge Chemical Plant (BRCP) Main Train (MT) units (EPLA-W, OLA-2X, and BELA) shut down as part of normal planned maintenance, consisting of cleaning, replacement, and improvement activities. During the shutdown of the units, excess gas sent to the flare system was flared, causing an RFI. The root cause of the flaring was shutting down for planned maintenance.
Corrective Action(s) Completed	None – planned event
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
9/30/2021 6:30– 9/30/2021 14:00	7.5	35.1 lbs	2.0 lbs
Covered Flares(s)	Flare 7		
Root Cause	During normal operations of an OXO stabilizer grade switch, excess gas remained in the unit that needed to be relieved which led to an RFI. Excess gas was maximized to the refinery fuel gas system through the high pressure burner line (HPBL) to minimize flare gas. The root cause of the RFI was an OXO grade switch. Grade switches are inherent to OXO's unit operations.		
Corrective Action(s) Completed	None – planned event		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
10/02/2021 22:47– 10/04/2021 21:29	46.7	28.5 lbs	1.3 lbs
Covered Flares(s)	Flare 10 and Flare 26		
Root Cause	On September 18th, BRCP began a planned two-month unit shut down for a turnaround, which reduced typical fuel gas consumption by 95%. Turnaround conditions reduced		

	fuel gas consumption for the South Ethylene Purification Unit (EPLA-S). On October 2nd, pressure variations at EPLA-S required increasing the tail gas flow from the unit to the fuel gas system. With most fuel gas consumers out of service during the turnaround, the excess fuel gas was routed to the flare system to prevent overpressure. This excess gas was flared and contributed to an RFI. Within the same hour, the Baton Rouge Turbine Generator (BRTG) unit within BRCP had a steam letdown valve (TF117) close unexpectedly due to a failed valve positioner. This sudden closure of the valve reduced production of steam across BRCP and this loss of steam further reduced fuel gas consumption, and also relieved to the flare header which aided in the RFI. The root cause of the fuel gas flaring from EPLA-S was pressure variations on the unit occurring during BRCP's turnaround in an abnormal state of operation. Concurrently, the root cause of the flaring from BRTG was a failed valve positioner TF117.
Corrective Action(s) Completed	BRTG replaced the failed valve positioner TF117 to re-establish steam letdown, and EPLA-S added guidance on controlling tail gas pressures during abnormal operations.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
10/06/2021 22:14–10/09/2021 12:06	61.9	83.9 lbs	2.6 lbs
Covered Flares(s)	Flare 10 and Flare 26		
Root Cause	On October 6th, at BRCP, the Ethylene Purification Tower (TT03) on the South Ethylene Purification Unit (EPLA-S) had an upset that resulted in flaring of off-spec ethylene product. The root cause was hydrates forming in the TT03 distillation tower resulting in flood, which is the loss of separation efficiency. The flaring ended after the EPLA-S drier was regenerated, feed rates were reduced, and a methanol wash was performed, which cleared the tower of formed hydrates and ethylene product was no longer off-		

	spec. The root cause of the RFI was hydrates forming in the tower.
Corrective Action(s) Completed	The EPLA-S drier was regenerated, and to get ethylene product on-spec feed rates were reduced and a methanol wash was performed.
Corrective Action(s) Still Outstanding	None

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
10/31/2021 1:58–11/08/2021 21:35	211.6	26,226 lbs	3,315 lbs
Covered Flares(s)	Flare 10, Flare 25, and Flare 26		
Root Cause	The Baton Rouge Chemical Plant (BRCP) Main Train (MT) units (EPLA-W, ECLA-W, OLA-2X, and BELA) started up following a scheduled turnaround, during which planned maintenance was performed on the unit, including cleaning, replacement, and improvement activities. As anticipated during start up, excess gas is added to the system and needs to be relieved, causing an RFI. The root cause of the RFI was starting up from a planned downtime.		
Corrective Action(s) Completed	None – planned event		
Corrective Action(s) Still Outstanding	None		

Date	**Duration, *Hours***	**Amount Emitted**	
		VOCs	**HAPs**
12/16/2021 12:00–12/16/2021 18:00	6.0	23.2 lbs	1.3 lbs
Covered Flares(s)	Flare 7		
Root Cause	During normal operations of an OXO stabilizer grade switch, excess gas remained in the unit that needed to be relieved which led to an RFI. Excess gas was maximized to the refinery fuel gas system through the high pressure burner line (HPBL) to minimize flare gas. The root cause		

	of the RFI was an OXO grade switch. Grade switches are inherent to OXO's unit operations.
Corrective Action(s) Completed	None – planned event
Corrective Action(s) Still Outstanding	None

Paragraph 34.b.vii. of the Consent Decree requires an analysis of any trends identified in the number of Reportable Flaring Incidents, the root causes, or the types of corrective actions(s).

Status: ExxonMobil Baton Rouge Chemical Plant did not identify trends in the number of RFIs, the root causes, or the types of corrective action(s). ExxonMobil Baton Rouge Chemical Plant recognized two RFIs as a result of OXO stabilizer gradeswitches during this reporting period, however, OXO stabilizer gradeswitches are a part of planned operational transition activities.

Consent Decree Paragraph 66h.

h. A summary of the following, per Covered Flare per Calendar Quarter (hours shall be rounded to the nearest tenth):

(1) The total number of hours of Instrument Downtime claimed pursuant to Paragraph 45, expressed as both an absolute number and a percentage of time the Covered Flare that the instrument/equipment monitors is In Operation and Capable of Receiving Sweep, Supplemental, and/or Waste Gas;

TABLE 8.1 3rd Quarter 2021 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Flare 7	Assist Steam Monitoring	0.0	0.0
Flare 7	Vent Gas Flow Monitoring	0.0	0.0
Flare 7	Net Heating Value Monitoring	0.0	0.0
Flare 7	Camera	0.0	0.0
Flare 10	Floanda Assist Steam Monitoring	0.0	0.0
Flare 10	Center Assist Steam Monitoring	0.0	0.0
Flare 10	Vent Gas Flow Monitoring	0.0	0.0
Flare 10	Net Heating Value Monitoring	1.1	23.5
Flare 10	Camera	0.0	0.0
Flare 16	Assist Steam Monitoring	1.0	23.0
Flare 16	Vent Gas Flow Monitoring (D101)	0.0	0.0
Flare 16	Vent Gas Flow Monitoring (D111)	0.0	0.0
Flare 16	Net Heating Value Monitoring (D101)	0.3	5.6

Flare 16	Net Heating Value Monitoring (D111)	0.3	5.6
Flare 16	Camera	0.0	0.0
Flare 25	Assist Steam Monitoring	0.0	0.0
Flare 25	Vent Gas Flow Monitoring	0.0	0.0
Flare 25	Net Heating Value Monitoring	0.3	6.3
Flare 25	Camera	0.0	0.0
Flare 26	Floanda Assist Steam Monitoring	0.0	0.0
Flare 26	Center Assist Steam Monitoring	0.0	0.0
Flare 26	Vent Gas Flow Monitoring	0.0	0.0
Flare 26	Net Heating Value Monitoring	0.1	3.0
Flare 26	Camera	0.0	0.0

TABLE 8.2 4th Quarter 2021 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Flare 7	Assist Steam Monitoring	0.0	0.0
Flare 7	Vent Gas Flow Monitoring	0.0	0.3
Flare 7	Net Heating Value Monitoring	0.0	0.0
Flare 7	Camera	0.0	0.0
Flare 10	Floanda Assist Steam Monitoring	0.0	0.0
Flare 10	Center Assist Steam Monitoring	0.0	0.0
Flare 10	Vent Gas Flow Monitoring	0.0	0.0
Flare 10	Net Heating Value Monitoring	0.1	1.0
Flare 10	Camera	0.0	0.3
Flare 16	Assist Steam Monitoring	1.0	23.0

Flare 16	Vent Gas Flow Monitoring (D101)	0.1	1.4
Flare 16	Vent Gas Flow Monitoring (D111)	0.1	1.4
Flare 16	Net Heating Value Monitoring (D101)	0.0	0.5
Flare 16	Net Heating Value Monitoring (D111)	0.0	0.5
Flare 16	Camera	0.0	0.3
Flare 25	Assist Steam Monitoring	0.1	1
Flare 25	Vent Gas Flow Monitoring	0.0	0.8
Flare 25	Net Heating Value Monitoring	0.1	1.3
Flare 25	Camera	0.0	0.3
Flare 26	Floanda Assist Steam Monitoring	0.0	0.0
Flare 26	Center Assist Steam Monitoring	0.1	2.8
Flare 26	Vent Gas Flow Monitoring	0.0	0.5
Flare 26	Net Heating Value Monitoring	0.0	0.0
Flare 26	Camera	0.0	0.3

(2) If the total number of hours of Instrument Downtime claimed pursuant to Paragraph 45 exceeds 5% of the time in a Calendar Quarter the Covered Flare affected by the downtime is In Operation, an identification of the periods of downtime by date, time, cause (including Malfunction or maintenance), and, if the cause is asserted to be a Malfunction, the corrective action taken;

Status: No Covered Flare incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the Flare was In Operation in any Calendar Quarter, as noted by "None" in Tables 8.3 – 8.4.

TABLE 8.3 3rd Quarter 2021 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 8.4 4th Quarter 2021 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

(3) The total number of hours, expressed as both an absolute number of hours and a percentage of time that the Covered Flare was In Operation, in which the requirements of Paragraphs 43-44 were not applicable because the only gas or gases being vented were Pilot Gas or Purge Gas;

TABLE 8.5 3rd Quarter 2021 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow

Covered Flare	Time (%)	Time (Hours)
Flare 7	0.0	0.0
Flare 10	86.2	1,902.3
Flare 16	0.0	0.0
Flare 25	0.0	0.0
Flare 26	83.7	1,848.3

TABLE 8.6 4th Quarter 2021 Requirements of Paragraphs 43-44 Were Not Applicable Because Only Pilot or Purge Gas Flow

Covered Flare	Time (%)	Time (Hours)
Flare 7	0.0	0.0
Flare 10	88.9	1,963.5
Flare 16	0.0	0.0
Flare 25	0.0	0.0
Flare 26	87.3	1,927.1

(4) Exceedances of Combustion Efficiency Standards.

i. The total number of hours, expressed as both an absolute number of hours and a percentage of time the Covered Flare was In Operation, of exceedances of the emissions standards in Paragraphs 43-44; provided however, that if the exceedance of these standards was less than 5% of the time in a Calendar Quarter and was due to one or more of the exceptions set forth in Paragraph 45, the report shall so note; and

Status: No exceedance of combustion efficiency standards was due to one or more of the exceptions set forth in Paragraph 45, as noted by "None" in Tables 8.7 – 8.8.

TABLE 8.7 3rd Quarter 2021 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
Flare 7	0.0	0.0	None	None
Flare 10	0.0	0.0	None	None
Flare 16	0.0	0.0	None	None
Flare 25	0.0	0.0	None	None
Flare 26	0.0	0.0	None	None

TABLE 8.8 4th Quarter 2021 Exceedance of Paragraph 43-44 Standards

Covered Flare	Total Exceedance of Emissions Standards		Subset of Exceedances Less Than 5% of the Time in Calendar Quarter and Due to One of the Exceptions Set Forth in Paragraph 45	
	Time (%)	Time (Hours)	Time (%)	Time (Hours)
Flare 7	0.0	0.0	None	None
Flare 10	0.0	0.0	None	None
Flare 16	0.0	0.0	None	None
Flare 25	0.0	0.0	None	None
Flare 26	0.0	0.0	None	None

ii. If the exceedance of the emissions standards in Paragraphs 43-44 was not due to one of the exceptions in Paragraph 45 (Instrument Downtime), or if the exceedance was due to one or more of the exceptions in Paragraph 45 and the total number of hours caused by the exceptions exceeds 5% of the time in a Calendar Quarter that the Covered Flare affected by the Instrument Downtime was In Operation, an identification of each block period that exceeded the standard, by time and date; the cause of the exceedance (including startup, shutdown, maintenance, or Malfunction), and if the cause is asserted to be a Malfunction, an explanation and any corrective actions taken; and

Status: Two exceedances of the combustion efficiency standard, not due to one of the exceptions set forth in Paragraph 45, as noted in Tables 8.9 – 8.10.

TABLE 8.9 3rd Quarter 2021 Exceedance of Combustion Efficiency Standards

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Flare 25	NHVcz	7/22/2021 11:00	7/22/2021 11:15	Manual steam controls were utilized to manage Visible Emissions, resulting in excess steam flow to the flare.	Steam flow was reduced and automated steam controls were restored.
		7/22/2021 11:15	7/22/2021 11:30		

TABLE 8.10 4th Quarter 2021 Exceedance of Combustion Efficiency Standards

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

(5) Compliance with Compressor Availability Requirements. Sufficient information to document compliance with the FGRS Compressor availability requirements of sub-Paragraph 38.b. For any period of non-compliance, the Defendants must identify the date, cause, and corrective action taken.

Requirements Related to Compressors Being Available for Operation
Requirement: CD Paragraph 38b.iii.
iii. Baton Rouge Chemical Plant FGRS Operation and Availability.
The Baton Rouge Chemical Plant FGRS must have one Compressor Available for Operation or in operation 98% of the time and two Compressors Available for Operation or in operation 90% of the time. The periods provided for in sub-Paragraphs 38.c. and 38.d. below may be included in the amount of time that the Compressors are Available for Operation when determining compliance with the requirement to have two Compressors Available for Operation or in operation 90% of the time.

Status: ExxonMobil Baton Rouge Chemical Plant's Flare Gas Recovery System (FGRS) includes two Compressors that support Covered Flare 10, Flare 16, Flare 25, and Flare 26. These Compressors are C-101A and C-101B. Sub-paragraph 38.b.iv. requires the ExxonMobil Baton Rouge Chemical Plant FGRS to have one Compressor Available for Operation or in operation 98% of the time and two Compressors Available for Operation or in operation 90% of the time. The 8,760-hour rolling sum, rolled hourly, began June 6, 2018 for this existing FGRS. The FGRS Compressor availability calculations, using the methodology provided in CD Paragraph 38.f "Period to be Used for Computing Percentage of Time", demonstrated that the FGRS met the availability requirements, as shown in Table 8.11.

TABLE 8.11 FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor Count	Actual Minimum Availability (%)	Required Minimum Availability (%)
Flare 10, Flare16, Flare 25, Flare 26	1	99.6	98
	2	95.6	90

[1] The Actual Minimum Availability provided is the minimum percentage of time that the Baton Rouge Chemical Plant had the listed number of FGRS Compressors Available for Operation or in operation from July 1, 2021 through December 31, 2021, using the 8,760-hour rolling sum, rolled hourly, as prescribed in CD Paragraph 38.f (i.e., the rolling sum included only the previous 8,760 1-hour periods when Potentially Recoverable Gas was generated during all or part of the hour, provided that the Potentially Recoverable Gas was not generated by flows that could not have been prevented through reasonable planning and were in anticipation of or caused by a natural disaster, act of war or terrorism, or External Utility Loss).

Requirements Related to Compressors Being Available for Operation
Requirement: CD Paragraph 38c.
c. Maintenance of FGRS. Periods of maintenance on and subsequent restart of the Compressor(s) may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have a Compressor Available for Operation or in operation; provided however, these periods must not exceed 1,344 hours per Compressor in a five-

year rolling sum period, rolled daily. The Defendants must use best efforts to schedule maintenance activities during a turnaround of the process units venting to the Covered Flare(s) served by the applicable FGRS. To the extent it is not practicable to undertake these maintenance activities during a turnaround of these units, the Defendants must use best efforts to minimize the generation of Waste Gas during such periods.

Status: Periods of maintenance on and subsequent restart of the Compressor(s) included in the amount of time that a Compressor is Available for Operation is provided in Table 8.12. These periods do not exceed the 1,344 hours per Compressor in a five-year rolling sum period, rolled daily.

TABLE 8.12 Periods of Maintenance Included in FGRS Operation and Availability

Covered Flare(s)	FGRS Compressor	Date	Hours	Five-year Rolling Sum (hours)
Flare 10, Flare16, Flare 25, Flare 26	C-101A	None	None	0
	C-101B	None	None	0

Requirements Related to Compressors Being Available for Operation – FGRS Shut Down
Requirement: CD Paragraph 38d.
d. FGRS Shut Down. Periods in which the FGRS is shut down (including the subsequent restart) due to operating conditions (such as high temperatures or large quantities of entrained liquid in the Vent Gas) outside the design operating range of the FGRS, including the associated knock-out drum(s), such that the outage is necessary for safety or to preserve the mechanical integrity of the FGRS may be included in the amount of time that a Compressor is Available for Operation when determining compliance with the requirement to have the Compressor Available for Operation or in operation. By no later than 45 Days after any such outage, the Defendants must investigate the root cause and all contributing causes of the outage and must implement, as expeditiously as practicable, corrective action, if any, to prevent a recurrence of the cause(s). In the reports due under Section IX (Reporting Requirements) of this Decree, the Defendants must describe each outage that occurred under the conditions identified in this sub-Paragraph, including the date, duration, cause(s), corrective action, and the status of the implementation of corrective action.

Status: There were no periods when the FGRS is shut down and/or restarted due to operating conditions outside the design operating range of the FGRS, which are also included in FGRS availability as allowed under CD Paragraph 38.d, as noted by "None" in Table 8.13.

TABLE 8.13 FGRS Outages Included in FGRS Availability
July 1, 2021 – December 31, 2021

Covered Flare(s)	FGRS Compressor	Outage Start Date	Duration (hours)	Cause(s)	Corrective Action(s) and Status
None	None	None	None	None	None

Status: As per Consent Decree Paragraph 66h(5), there were no periods of FGRS non-compliance, as noted by "None" in Table. 8.14.

TABLE 8.14 FGRS Non-Compliance July 1, 2021 – December 31, 2021

Covered Flare(s)	FGRS Compressor	Start Date	Cause(s)	Corrective Action(s)
None	None	None	None	None

Consent Decree Paragraph 66i.

i. Any additional matters that the Defendants believe should be brought to the attention of EPA, or LDEQ for the Baton Rouge Facilities.

Status: ExxonMobil Baton Rouge Chemical Plant submitted a "Request for Termination" on October 28, 2021.

SECTION 10 FENCELINE AIR MONITORING REPORTS

Consent Decree Paragraph 67 a. – b.

The Defendants must submit Fenceline Air Monitoring Reports as part of each Semi-Annual Report. The Fenceline Air Monitoring Reports must contain the following information:

a. In spreadsheet format, the individual sample results for each monitor comprising each Fenceline Monitoring System, each bi-weekly annual average benzene concentration difference value (once annual averages are available), and the corresponding meteorological data for the relevant monitoring periods. The first two columns of each spreadsheet shall be the date and time for each sample taken; and

b. A detailed description of the actions and findings of any root cause analysis and corrective action(s) undertaken pursuant to Paragraph 3(g) of Appendix 2.2, including the known results of the corrective action(s) and the anticipated emissions reductions (in TPY per pollutant).

Status: ExxonMobil Baton Rouge Chemical Plant began collecting fenceline monitoring May 27, 2019 (retrieval June 10, 2019). The individual sample results for the samples that were collected between July 1, 2021 – December 31, 2021 and the corresponding meteorological data for the relevant monitoring periods are provided in Attachment A. The bi-weekly annual average benzene concentration difference value began once there were twenty six 14-Day sampling periods (retrieval of 26th sample on May 26, 2020).

ExxonMobil Baton Rouge Chemical Plant has remained below the action level of 9 µg/m3 and thus, no root cause analyses or corrective actions were undertaken during this reporting period.

SECTION 11 ANNUAL EMISSION DATA

Consent Decree Paragraph 68

In the Semi Annual Report that is submitted on February 28 of each year, the Defendants must provide, for each Covered Flare, for the prior calendar year, the amount of emissions of the following compounds (in tons per year): VOCs, HAPs, NOx, CO2, methane, and ethane.

Status: As of the date of this Semi-Annual Report, the annual emissions for calendar year 2021 are reflected in Table 11.1 below.

Covered Flare	Emissions (tons per year)					
	VOCs	HAPs	NO_x	CO_2	Methane	Ethane
Flare 7	<1	<1	1	2,372	17	<1
Flare 10	7	1	4	7,606	12	1
Flare 16	15	2	13	20,291	45	1
Flare 25	11	58	10	16,798	39	1
Flare 26	20	1	18	16,783	22	2

SECTION 12 ANY ADDITIONAL NON-COMPLIANCE

Consent Decree Paragraph 69

Each Semi-Annual Report must also include a description of any non-compliance with the requirements of this Consent Decree not otherwise identified by Paragraph 66 along with an explanation of the violation's likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Defendants must so state in the report. In such a case, the Defendants must investigate the cause of the violation and then submit an amendment to the report, including a full explanation of the cause of the violation, within 30 Days of the Day the Defendants become aware of the cause of the violation. Nothing in this Paragraph or the following Paragraph relieves the Defendants of their obligation to provide the notice required by Section XI (Force Majeure).

TABLE 12.1 Additional Non-Compliance

Covered Flare	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Flare 16	07/19/2021 17:23	07/19/2021 17:39	Visible emissions occurred for greater than the regulatory limit, the cause was a composition change to the flare stack requiring manual intervention of additional steam.	Adjustments were made to steam/hydrocarbon ratio
Flare 25 and Flare 10	07/27/2021 1:41	07/27/2021 2:04	Visible emissions occurred due to a complex wide reduction in available steam. The root cause was the loss of steam production from a third party supplier (LA Station).	Steam was restored to flare once supply from third party was available.
Flare 16 and Flare 26	10/06/2021 13:19	10/06/2021 15:19	Visible emissions were incurred for greater than the regulatory limit due to loss of steam to the flare system. The root cause was incorrect valve isolation.	Valve was reopened and steam reintroduced to the flare.

Attachment A

2H21 Fenceline Monitoring Data

ExxonMobil

Baton Rouge Chemicals Plant
ExxonMobil Chemical Company Flare Consent Decree
Fenceline Monitoring Requirements
Civil Action No. 4:17-cv-3302

			Sampler Name	BRCP-1CP	BRCP-2CP	BRCP-3CP	BRCP-4CP	BRCP-5CP	BRCP-6CP	BRCP-7CP	BRCP-8CP	BRCP-9CP	BRCP-10CP	BRCP-11CP	BRCP-12CP	BRCP-13CP	BRCP-14CP	BRCP-15CP	BRCP-16CP	BRCP-17CP	BRCP-18CP	Bi-weekly Annual Average ΔC (ug/m3)
			Sampler Latitude	30.500731	30.500440	30.500378	30.501617	30.500681	30.499859	30.498726	30.497321	30.496581	30.495007	30.493431	30.492893	30.493372	30.493732	30.496019	30.497644	30.499564	30.501137	
			Sampler Longitude	-91.175096	-91.173778	-91.172148	-91.170248	-91.170113	-91.170066	-91.170096	-91.170047	-91.169941	-91.169777	-91.169624	-91.171804	-91.174775	-91.176657	-91.176718	-91.176667	-91.176894	-91.176892	
Date of Retrieval	Time of Retrieval	Temperature (ºC)	Barometric Pressure (hPA)	Benzene Sample Results (ug/m3)																		
7/7/2021	9:05	26.3	1015.7	3.0	2.1	1.2	0.8	1.0	1.0	1.0	1.0	1.0	1.2	1.2	2.7	2.2	2.2	1.5	1.8	2.8	4.1	3.0
7/21/2021	9:19	26	1018.2	4.5	3.3	1.7	1.1	1.3	1.2	1.4	1.4	1.4	1.4	1.8	6.1	4.0	3.4	2.3	2.4	3.7	3.9	2.6
8/4/2021	8:27	27.2	1016.4	2.0	2.4	1.8	1.0	1.2	1.2	1.2	1.4	1.3	1.7	2.0	4.0	2.4	2.0	1.2	1.3	1.4	1.0	2.7
8/18/2021	9:10	26.0	1017.3	3.0	1.8	1.3	1.1	1.2	1.3	1.4	1.4	1.4	1.7	2.0	4.2	3.0	2.5	1.7	2.2	2.2	1.4	2.7
9/2/2021	10:39	26.7	1013.1	3.4	3.0	2.2	1.2	1.4	1.4	1.7	1.5	1.6	1.8	2.1	2.6	3.5	2.8	1.9	2.3	2.3	1.8	2.7
9/15/2021	10:54	24.9	1015.1	4.9	2.0	1.2	0.9	1.3	1.3	1.4	1.2	1.3	1.5	1.7	4.9	3.6	2.9	2.5	2.6	6.9	1.8	2.9
9/29/2021	8:27	23.0	1015.7	15.0	7.9	5.0	1.6	2.2	1.8	2.0	1.9	1.9	1.8	1.8	9.4	6.4	4.6	4.9	11.0	11.0	12.0	3.3
10/13/2021	9:41	23.6	1015.5	11.0	2.6	1.3	0.9	1.3	1.1	1.3	2.3	1.4	1.2	1.2	3.4	2.9	3.1	3.9	6.5	7.1	4.0	3.6
10/27/2021	8:35	21.8	1017	13.0	2.3	1.2	1.1	1.3	1.4	1.3	1.3	1.2	1.3	1.3	4.2	3.4	2.8	3.1	6.6	12.0	3.8	3.9
11/10/2021	8:59	14.5	1018.4	2.8	2.3	1.7	1.3	1.5	1.4	1.5	1.4	1.4	1.4	1.4	2.5	2.1	1.8	1.9	3.4	3.9	1.7	3.9
11/23/2021	8:59	14.9	1021.5	7.1	2.6	1.6	1.1	1.2	1.3	1.4	1.5	1.5	1.6	1.7	6.4	2.1	2.0	1.7	2.4	3.5	2.9	4.1
12/8/2021	9:20	13.9	1020.1	5.4	4.2	2.4	1.8	2.1	1.8	1.9	2.2	2.3	2.7	3.0	4.9	3.5	3.4	2.7	3.6	3.9	2.4	4.2
12/21/2021	7:27	16.3	1020.1	12.0	2.4	1.3	0.9	0.9	1.0	0.9	0.9	1.0	0.9	1.1	1.6	1.5	1.5	1.6	2.2	4.5	3.9	4.6
1/5/2022	9:12	16.6	1016.5	5.2	5.4	2.1	1.7	1.6	1.5	1.7	1.7	1.5	1.8	2.3	2.7	2.6	3.6	3.0	2.6	3.2	2.9	4.6

Attachment B

Copies of Report Submittals to the LDEQ

ExxonMobil Chemical Company
Baton Rouge Chemicals North
5855 Scenic Highway
Baton Rouge, Louisiana 70805

ExxonMobil

March 26, 2021
7019 0700 0000 8735 8100

Title V Program
Enforcement Division
Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: 2H20 Part 70 General Condition K Report
2H20 Part 70 General Condition R Report
2H20 Louisiana General Condition XI.C Report
ExxonMobil Chemical Company, Baton Rouge Chemicals North (BRCN)
BRCN Agency Interest No. 1395

Dear Sir or Madam:

ExxonMobil Chemical Company, Baton Rouge Chemicals North (BRCN) has a Part 70 Permit. The following table lists the applicable dates and permit version for the reporting period.

Permit Number	Deviation Listed in This Report?	Operating Area	Reporting Period
0840-00008-V2	No	Baton Rouge Chemicals North	7/1/2020 through 12/31/2020

This submittal includes the following reports.

2H20 Part 70 General Condition K & 2H20 Part 70 General Condition R Reports

The Part 70 General Condition K and R Reports cover the reporting period from July 1, 2020 through December 31, 2020 (2H20). These reports are consolidated, as allowed by the Part 70 General Condition K. These reports address the Part 70 General Conditions, Part 70 Specific Conditions, emission limitations (except where identified as "State Only") listed in the Part 70 Permit, along with the applicable regulatory requirements identified in Tables 1 and 2 of the Part 70 Permit (except where identified as "State Only").

Note: BRCN has no Part 70 deviations or excess emissions to report for 2H20.

2H20 Louisiana General Condition XI.C Report

The Louisiana General Condition XI.C Report covers the reporting period from July 1, 2020 through December 31, 2020 (2H20). This report addresses excess emissions of "State Only" limitations and regulatory requirements not otherwise reported in the Part 70 General Condition R Report, as allowed by Louisiana General Condition XIX.

Note: BRCN has no "State Only" excess emissions to report for 2H20.

I certify, based on information and belief formed after reasonable inquiry (based on the procedures, methods, devices and activities used to maintain compliance), that ExxonMobil Chemical Company, Baton Rouge Chemicals North (BRCN) has been in continuous compliance during the permit term with all federally enforceable Clean Air Act applicable requirements for the approved Part 70 Permits, except as previously reported per General Condition R and summarized in this submittal.

Compliance certification with 40 CFR Part 68 requirements (Risk Management Plan or "RMP") is based on ExxonMobil's Operations Integrity Management System (OIMS), which addresses all elements of the RMP Program. The OIMS contains processes, procedures, and assessment protocols to evaluate the company's continued compliance with RMP requirements, including continuous improvement.

I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in the attached reports are true, accurate, and complete.

If you have questions or need further information, please contact Neysha Tirado-Melendez at (225) 540-0268.

Sincerely,

David A. Luecke, Site Manager

c: April Baiamonte, LDEQ Capital Regional Office
LDEQ Office of Environmental Services, Air Permits Division

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P.O. Box 241
Baton Rouge, LA 70821
225 540 5242 Tel
dave.a.luecke@exxonmobil.com

David A. Luecke
Site Manager

ExxonMobil

March 26, 2021

7019 0700 8735 8148

Title V Program
Enforcement Division
Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: 2H20 Part 70 General Condition K Report
2H20 Part 70 General Condition R Report
2II20 Louisiana General Condition XI.C Report
ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP)
BRCP Agency Interest No. 286

Dear Sir or Madam:

ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP) has Part 70 Permits for several operating areas. The following reports are attached:

2II20 Part 70 General Condition K & 2H20 Part 70 General Condition R Reports

The Part 70 General Condition K and R Reports cover the reporting period from July 1, 2020 through December 31, 2020 (2H20). These reports are consolidated, as allowed by the Part 70 General Condition K. These reports address the Part 70 General Conditions, Part 70 Specific Conditions, emission limitations (except where identified as "State Only") listed in the Part 70 Permit, along with the applicable regulatory requirements identified in Tables 1 and 2 of the Part 70 Permit (except where identified as "State Only").

2H20 Louisiana General Condition XI.C Report

The Louisiana General Condition XI.C Report covers the reporting period from July 1, 2020 through December 31, 2020 (2H20). This report addresses excess emissions of "State Only" limitations and regulatory requirements not otherwise reported in the Part 70 General Condition R Report, as allowed by Louisiana General Condition XIX.

Note: BRCP has no "State Only" excess emissions to report for 2H20.

CP 1.9.03.01.21.001
ENV7000

I certify, based on information and belief formed after reasonable inquiry (based on the procedures, methods, devices and activities used to maintain compliance), that ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP) has been in continuous compliance during the permit term with all federally enforceable Clean Air Act applicable requirements for the approved Part 70 Permits, except as previously reported per General Condition R and summarized in this submittal.

Compliance certification with 40 CFR Part 68 requirements (Risk Management Plan or "RMP") is based on ExxonMobil's Operations Integrity Management System (OIMS), which addresses all elements of the RMP Program. The OIMS contains processes, procedures, and assessment protocols to evaluate the company's continued compliance with RMP requirements, including continuous improvement.

I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in the attached reports are true, accurate, and complete.

If you have questions or need further information, please contact Neysha Tirado-Melendez at (225) 540-0268.

Sincerely,

c: April Baiamonte, LDEQ Capital Regional Office
LDEQ Office of Environmental Services, Air Permits Division

ExxonMobil Chemical Company
Baton Rouge Chemical Plant (BRCP)
Permit List for Reporting Period
July 1, 2020 through December 31, 2020 (2H20)

Permit Number	Deviation Listed in this Report?	Operating Area	Reporting Period
1911-V5	No	Adhesions (includes Heartcut Distillate, E-1000, and E-5000)	7/1/2020 – 12/31/2020
3006-V4	No	Advanced Water Treatment	7/1/2020 – 12/31/2020
2299-V9	No	Aromatics	7/1/2020 – 12/31/2020
2012-V3	No	Baton Rouge Turbine Generator	7/1/2020 – 12/31/2020
2367-V4	No	CoProducts	7/1/2020 – 12/31/2020
2166-V7	No	Halobutyl	7/1/2020 – 12/31/2020
1924-V6	No	Isopropyl Alcohol	7/1/2020 – 12/31/2020
2031-V13	No	Maintrain Ethylene Production Facilities	7/1/2020 – 12/31/2020
2281-V7	No	Methyl Ethyl Ketone/ Sec-Butyl Alcohol	7/1/2020 – 12/31/2020
2379-V2	No	Neo Acids	7/1/2020 – 12/31/2020
2123-V4	No	NOVA Units	12/3/2020 – 12/31/2020
2123-V3	No		7/1/2020 – 12/2/2020
2365-V8	Yes	OXO Alcohol	7/1/2020 – 12/31/2020
2393-V4	No	OXO Tankfield	7/1/2020 – 12/31/2020
2210-V2	No	Partial Oxidation	7/1/2020– 12/31/2020
1200-V4	Yes	Phthalic Anhydride	7/1/2020– 12/31/2020
2390-V5	Yes	Plant Infrastructure Facilities	7/1/2020– 12/31/2020
2320-V4	No	Plasticizer	7/1/2020– 12/31/2020
2396-V3	No	Poly	7/1/2020– 12/31/2020
2361-V5	No	Refinery Gas Recovery	7/1/2020– 12/31/2020
2376-V7	No	VISTALON®	7/1/2020– 12/31/2020

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
Part 70 General Condition K and R Reports
July 1, 2020 through December 31, 2020 (2H20)

Event	Permit Name	Permit Number	Regulation / Citation	Date of Occurrence	Description of Deviation	Additional Information
A	OXO Alcohol Unit, Phthalic Anhydride Units	2365-V8, 1200-V4	Fugitive Emissions Program Consolidation Guidelines MOU Revised 2/7/05 40 CFR 63 Subpart UU	2H20	Permit term/Condition: Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, and shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance Unit / ID / No. of OELs OXO / U-28 / 1 PALA / U-30 / 1	Corrective Action: Valve was closed by Operations promptly upon discovery.
B	Plant Infrastructure Facilities	2390-V5	40 CFR 63 Subpart G	3/24/2020	Permit term/Condition: Reduce hazardous air pollutants to the atmosphere by operating and maintaining a closed-vent system that routes to a control device On March 24, 2020 operations discovered a leak from Tank 8 pressure vent. Upon investigation it was discovered the hood portion of the PV vent was not properly secured which led to a gasket leak.	Root Cause: The gasket nuts were not re-attached to bolts on PV Vent weather hood following annual maintenance task. Corrective Action: Operations secured the hood portion and verified closure with gas test and hawk camera.
C	Plant Infrastructure Facilities	2390-V5	40 CFR 60 and 63 Subpart A (60.18, 63.11)	9/3/2020	Permit term/condition: Flares shall be designed for and operated with no visible emissions, except for the periods not to exceed a total of 5 minutes during any 2 consecutive hour period On September 3, 2020, at approximately 21:00 hours, Flare #26 smoked intermittently for a total of 5 minutes and 17 seconds in a 2 consecutive hour period.	Root Cause: There was a delayed response from the steam flow control valve, which resulted in smoking. Corrective Action: Operations responded immediately by switching to Flare #10 as expeditiously as possible, which ended the smoking event. Additional preventative maintenance has been established for the flare steam control loop systems.

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
Part 70 General Condition K and R Reports
July 1, 2020 through December 31, 2020 (2H20)

The following items are listed separately and are not considered permit violations because the scenarios were not part of the permit basis, based on the information provided under "Nature of Exception" in the table below.

Event	Permit Name	Permit Number	Regulation / Citation	Date of Occurrence	Nature of Exception		
D	BRTG	2012-V3	CAM Plan 2.1.1.6		BRTG CAM Plan requires reporting of certain events that occur during calibration, maintenance, malfunction, startup, or shutdown. As listed in the following table, the BRTG average steam-to-fuel ratio was less than the required 1.3 for various times on the dates listed. The provisions of the CAM Plan do not apply during periods of maintenance, malfunction, startup, or shutdown (SSM). Since these events occurred during a period of SSM, the CAM Plan provisions do not apply in accordance with Section 2.1.1.6.		
				Date	**No. of Hours**	**Reason**	
				None	None	None	

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
State General Condition XI.C Report
2H20 Semiannual Report

There were no additional deviations reportable under State General Condition XI.C during the semiannual reporting period.

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P.O. Box 241
Baton Rouge, LA 70821

David A. Luecke
Site Manager

ExxonMobil

November 12, 2020

Certified Mail No. 7019 2970 0000 6254 3331

Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: HON Semiannual Report
ExxonMobil Chemical Company, Baton Rouge Chemical Plant
Agency Interest No. 286

Dear Sir or Madam:

As required by 40 CFR 63.152(c), the owner or operator of an affected facility subject to 40 CFR Part 63, Subparts F and G shall submit semiannual reports to the LDEQ. The attached Table 1 contains the requested information as applicable to the facilities at the ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP), for the period from March 19, 2020 through September 18, 2020. With the exception of the information regarding closed-vent systems, equipment leaks at BRCP subject to 40 CFR Part 63, Subparts H and I are covered in a separate semiannual report.

If you have any questions or need more information, please contact Brooke Pittman at (225) 540-5864.

I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this report are true, accurate, and complete.

Sincerely,

David A. Luecke

c: April Baiamonte, LDEQ Capital Regional Office

CP 5.3.03.1.20.002
ENV4000

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

40 CFR 63.152(c) and (d)(1) require the reporting of the following:

No.	Reporting Requirement	Response
Group 1 Process Vents and Transfer Racks		
1	For Group 1 Process Vents and Transfer Racks, the daily average values of monitored parameters for both excused and unexcused excursions For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected [§63.152(c)(2)(iii), §63.118(f)(1-2), §63.130(d)(1-2)]	No known excursions for Group 1 Process Vents or Transfer Racks at BRCP occurred during the reporting period.
2	For Group 1 Process Vents and Transfer Racks, the times and durations of all periods recorded when the vent stream was diverted from the control device [§63.118(f)(3), §63.130(d)(3)]	There were no known periods recorded when a HON Group 1 Process Vent or Transfer Rack at BRCP was diverted from a control device during this reporting period.
3	For Group 1 Process Vents, all periods recorded in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out [§63.118(f)(4)]	There were no known periods in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out for any HON Group 1 Process Vents at BRCP.
4	For Group 1 Transfer Racks, all periods recorded in which maintenance was performed on car-sealed valves, the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out [§63.130(d)(4)]	There were no known periods in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out for any HON Group 1 Transfer Racks at BRCP.
5	For Group 1 Process Vents and Transfer Racks, the times and durations of all periods recorded in which all pilot flames of a flare were absent [§63.118(f)(5), §63.130(d)(5)]	There were no known periods in which all pilot flames for a flare used as a HON control device at BRCP were absent during the reporting period.

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

No.	Reporting Requirement	Response
Group 2 Process Vents		
6	For Group 2 Process Vents: • Description of any process changes that caused the TRE index value to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold • Recalculation results of any group determination (flow rate, organic HAP concentration, or TRE index value) • Statement that the owner or operator will comply with the rule if the group status has changed and control is now required [§63.152(c)(4)(i), §63.117(a)(3), §63.118(g-j)]	No process changes occurred at a BRCP HON Unit during this reporting period that caused the TRE Index Value of a process vent to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold.
Group 1 Storage Vessels		
7	For Group 1 Storage Vessels, information regarding the occurrence of any control equipment failure, seal gap/ opening, or problem with a seal measurement [§63.122(d)(1)(ii), §63.122(d)(2)(ii), §63.122(e)(1,3)]	There were no known occurrences of control equipment failure, seal gap/opening, or a problem with a seal measurement during the reporting period for any HON Group 1 Storage Vessel at BRCP.
8	For Group 1 Storage Vessels, any extension used to repair or empty a tank [§63.122(d)(1)(iii), §63.122(e)(2)]	No extensions were needed to repair or empty any HON Group 1 Storage Vessel at BRCP during the reporting period.
9	For Group 1 Storage Vessels, a description of the planned routine maintenance that is anticipated to be performed for a control device during the next six month reporting period [§63.122(g)(1)(i)]	There is currently no planned maintenance work anticipated for applicable HON control devices during the next six month reporting period that will result in excess emissions.
10	For Group 1 Storage Vessels, a description of the planned routine maintenance that was performed for a control device during the previous six month reporting period [§63.122(g)(1)(ii)]	No planned maintenance was performed for an applicable control device during the previous six month reporting period that resulted in excess emissions.

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

No.	Reporting Requirement	Response
Group 1 Storage Vessels, Continued		
11	For Group 1 Storage Vessels, if a control device other than a flare is used, list each occurrence for the control device when the monitored parameter(s) were outside the established ranges as well as the cause. When specified by an applicable monitoring plan for Group 1 Storage Vessels, include the daily average values of monitored parameters for both excused and unexcused excursions. For excursions caused by lack of monitoring data, the duration of periods when monitoring data were not collected shall be specified. [§63.122(g)(2), §63.152(c)(2)(iii-iv)]	There were no known occurrences for non-flare control devices associated with Group 1 Storage Vessels at BRCP when the monitored parameter(s) were outside the established range.
12	For Group 1 Storage Vessels, if a flare is used, each occurrence when the flare does not meet the general control device requirements specified in §63.11(b) and the reason. [§63.122(g)(3)]	No known occurrences during the reporting period when a flare did not meet the general control device requirements specified in §63.11(b) while a Group 1 Storage Vessel was potentially venting to it. Any other applicable event during the reporting period is included in response to Item 5 or listed in the following table.

Flare No.	Start Date	Start Time	End Date	End Time	Duration (minutes)	Comment
26	9/3/20	21:00	9/3/20	21:48	5.3 min	On September 3, 2020, at approximately 21:00 hours, Flare #26 smoked intermittently for a total of 5 minutes and 17 seconds in a 2 consecutive hour period. There was a delayed response from the steam flow control valve, which resulted in smoking. Operations responded immediately by switching to Flare #10 as expeditiously as possible, which ended the smoking event. Additional preventative maintenance has been established for the flare steam control loop systems.

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

No.	Reporting Requirement	Response
Group 1 Storage Vessels, Continued		
13	For Group 1 Storage Vessels complying via a closed-vent system and control device, report all recorded periods when one of the following occurred • The vent stream was diverted from the control device through a bypass line • The seal mechanism was broken • The bypass line valve position changed • The key to unlock the bypass line valve was checked out [§63.148(j)]	During the reporting period, there were no known periods in which a vent stream was diverted from a control device through a bypass line, the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out for any HON Group 1 Storage Vessel at BRCP.
14	For Group 1 Storage Vessels complying via a closed-vent system and control device, report results from each closed-vent system visual inspection when a leak was detected [§63.148(j)]	There were no applicable equipment leaks on a closed-vent system associated with a HON Group 1 Storage Vessel that were detected during the reporting period.
Group 1 Process Wastewater Streams		
15	Information regarding Group 1 Process Wastewater Streams [§63.146(c), (d), (e), and (g)]	There are no HON Group 1 Process Wastewater Streams at BRCP.
16	For Group 1 Process Wastewater Streams transferred for treatment by another party in accordance with §63.132(g), include any changes in the identity of the treatment facility or the transferee [§63.152(c)(4)(iv)]	There are no HON Group 1 Process Wastewater Streams at BRCP.

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

No.	Reporting Requirement	Response
Heat Exchange Systems		
17	Delay of repair information for HON heat exchange systems. • Report the presence of the leak and the date that the leak was detected. • Report whether or not the leak has been repaired. • Report the reasons for delay of repair. If delay of repair is invoked due to the reasons described in paragraph (e)(2), documentation of emissions estimates must also be submitted. • If the leak remains unrepaired, the owner or operator shall report the expected date of repair. • If the leak is repaired, report the date the leak was successfully repaired. [§63.104(f)(2)(i-v)]	No leaks were detected in any HON heat exchange system subject to the requirements of 40 CFR 63, Subpart F at BRCP that required the use of the delay of repair provisions during the reporting period.
Startup, Shutdown, and Malfunction Plan		
18	Semiannual startup, shutdown, and malfunction required information [§63.152(d)(1), §63.10(d)(5)(ii), §63.6(e)(3)(viii)]	A list of applicable malfunctions that occurred during the reporting period is included in Table II as required. No other known malfunctions of control devices, continuous monitoring systems, or Group 1 Process Equipment at HON Units occurred during the reporting period. Actions at BRCP during startup, shutdown, and malfunction events in the reporting period were consistent with the Startup, Shutdown, and Malfunction (SSM) Plan. The SSM Plan was revised in August 2020 for MON IPA MCPU to include the addition of a Group 1 tank. There were no changes to HON MCPUs in the revised SSM Plan.
Implementation Plan		
19	Written update of Implementation Plan for sources using emission averaging provisions [§63.152(c)(4)(ii), §63.151(h) and (i)]	This requirement is not applicable, since BRCP has not elected to use emission averaging.

TABLE I
HON Semiannual Report
HON Units: Aromatics, BELA-5, BPLA, DARLA, MEK, and PALA

No.	Reporting Requirement	Response
Group Determinations and Process Changes		
20	Notification of any Group 2 Emission Point that has become a Group 1 Emission Point, including compliance schedule. Supplemental data for any group status change, change in compliance method, new emission point; or supplemental information regarding the Notification of Compliance Status (NCS) [§63.152(c)(2)(i-iv), §63.152 (c)(4)(ii-iii), §63.151(j), §63.100(l)(3) or (4)]	No Group 2 Emission Points became Group 1 Emission Points at BRCP during the reporting period.
21	Information concerning any HON performance test or group determination completed during the reporting period. [§63.152(c)(3), §63.117(a)(3), §63.129(a)(3)]	No performance tests were conducted at BRCP to demonstrate compliance with HON requirements during the reporting period.

Table II
HON Malfunctions

CMPU	Equipment	Start Date/Time	End Date/Time	Event Description
Aromatics	T-142, T-143, T-144	3/24/2020 9:34	3/24/2020 9:38	On March 24, 2020 at approximately 09:34 hours, the HCE Vapor Recovery System pressure went positive due to a failure of the level instrument of the vapor recovery suction pot, causing the pressure vents on HON Group 1 Storage Tanks T-142, T-143, and T-144 to lift and vent to the atmosphere. The vacuum jet was placed in service lowering the vapor recovery system pressure and the pressure vents on the tanks reseated. The level instrument was recalibrated and parts were replaced following the event.
Aromatics	T-148, T-350	6/3/2020 15:25	6/3/2020 15:26	On June 3, 2020 at approximately 15:25 hours, when swapping from the C-500A compressor to the C-500B compressor, the Aromatics HCE vapor recovery system suction pressure went positive due to a failure of the smart positioner of the water makeup valve to the liquid ring on the compressor causing the pressure vent on HON Group 1 Tanks T-148 & T-350 to lift and vent to the atmosphere. The vacuum jet was placed in service lowering the vapor recovery system pressure and the pressure vents on the tanks reseated. The water makeup valve was repaired and returned to service.
Aromatics	T-148	6/27/2020 5:32	6/27/2020 5:33	On June 27, 2020 at approximately 05:32 hours, the Aromatics HCE vapor recovery compressor C-500A tripped due to low flow, causing the pressure vents on HON Group 1 Storage Tank T-148 to lift and vent to the atmosphere for one minute. The low flow was caused by a malfunction of the mechanical linkage of the compressor discharge knockout pot float trap. The vacuum jet was immediately placed in service, and the system pressure was lowered and the pressure vent on the tank reseated. The float trap was repaired and returned to service.
PALA	V-354	7/15/2020 7:30	7/24/2020 19:07	On July 15, 2020 at approximately 07:30 hours, a leak was discovered on the waste gas header from E5 switch condensers to F6 thermal oxidizer. The leak was repaired.
Aromatics	T-144, T-350	8/27/2020 7:51	8/27/2020 8:12	On August 27, 2020 at approximately 07:51 hours, the Aromatics HCE vapor recovery compressor C-500B tripped due to faulty high level cut out switch, causing the pressure vents on two HON Group 1 Storage Tanks to lift and vent to the atmosphere. Operations attempted to restart the compressor, placing the vacuum jet in service when the compressor would not restart, and the system pressure was lowered and the pressure vent on the tanks resealed. The switch was replaced and the compressor was returned to service.

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P.O. Box 241
Baton Rouge, LA 70821

David A. Luecke
Site Manager

ExxonMobil

July 13, 2021

Certified Mail No. 7019 2970 0000 6254 3362

Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: Group I Polymers and Resins NESHAP Semiannual Report
ExxonMobil Chemical Company, Baton Rouge Chemical Plant
Agency Interest No. 286

Dear Sir or Madam:

As required by 40 CFR 63.506(e)(6), the owner or operator of an affected facility shall submit semiannual reports to the LDEQ for elastomer product process units (EPPUs) subject to 40 CFR 63 Subpart U. This semiannual report covers the period from November 17, 2020 through May 16, 2021, for the two EPPUs at the ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP), AI No. 286. The two EPPUs are the Halobutyl Polymerization and Finishing Unit (RLA-1/HFU or Halobutyl) and the Vistalon™ Polymerization and Finishing Unit (RLA-3/VFU or Vistalon™).

The attached Table I contains the applicable, required information for Halobutyl and Vistalon™. There are currently no batch front-end process vents or aggregate batch vent streams subject to Subpart U at BRCP. Except for information regarding the SSM Plan and surge control vessels / bottoms receivers included with this submittal, equipment subject to 40 CFR Part 63 Subpart H is covered in a separate semiannual report.

If you need more information, please call Kayla Townsend at (225) 540-1470.

I certify under provisions of Louisiana and United States law which provide criminal penalties for false statements that based on information and belief formed after reasonable inquiry the statements and information contained in this report are true, accurate, and complete.

Sincerely,

Dave Luecke
BRCP Site Manager

c: April Baiamonte, LDEQ Capital Regional Office Certified Mail No. 7017 0530 000 6715 0958

CP 5.4.03.21.002
ENV4000

TABLE I
Group I Polymers & Resins NESHAP

40 CFR 63.506(e)(6) requires the reporting of the following:

No.	Reporting Requirement	Response
Group 1 Storage Vessels		
1	For Group 1 Storage Vessels, information regarding the occurrence of any control equipment, seal gap, or seal failure. [§63.506(e)(6)(iii)(A), §63.122(d)(1)(ii), §63.122(d)(2)(ii), §63.122(d)(3)(ii), §63.122(e)(1, 3), and §63.122(f)]	There were no known occurrences of control equipment, seal gap, or seal failure during this reporting period for Group 1 Storage Vessels subject to Subpart U at BRCP, except any applicable event listed in Item 25.
2	For Group 1 Storage Vessels, information regarding any extension used to repair or empty a tank. [§63.506(e)(6)(iii)(A), §63.122(d)(1)(iii), §63.122(e)(2), §63.122(f), and §63.120(a)(4)]	No extensions were needed to repair or empty any Group 1 Storage Vessels subject to Subpart U at BRCP during the reporting period.
3	The daily average values of monitored parameters for all excursions involving Group 1 Storage Vessels. For excursions caused by lack of monitoring data, specify the start time and the duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(B)]	There were no excursions associated with Condenser E-200 or E-200A during the reporting period.
4	For Group 1 Storage Vessels, a description (i.e. type, planned frequency, length) of the planned routine maintenance anticipated to be performed for a control device during the next semiannual reporting period that would require it not to meet §63.119(e)(1) or (e)(2), as applicable. [§63.506(e)(6)(iii)(A), §63.122(g)(1)(i), §63.120(d)(4), and §63.120(e)(3)]	There are currently no maintenance activities planned for Condenser E-200 or E-200A during the next semiannual reporting period that would require them not to meet applicable requirements of §63.119(e)(1) or (e)(2).
5	For Group 1 Storage Vessels, a description of the planned routine maintenance performed for a control device during the most recent semiannual reporting period that required it not to meet §63.119(e)(1) or (e)(2), as applicable. Include the total number of hours the control device did not meet §63.119(e)(1) or (e)(2), as applicable. [§63.506(e)(6)(iii)(A), §63.122(g)(1)(ii), §63.120(d)(4), and §63.120(e)(3)]	There were no times recorded during the reporting period during which Condenser E-200 or E-200A did not meet the applicable requirements of §63.119(e)(1) or (e)(2) due to planned routine maintenance.
6	For Group 1 Storage Vessels, if a control device other than a flare is used, list each occurrence for the control device when the monitored parameter(s) were outside the established ranges as well as the cause. [§63.506(e)(6)(iii)(A) and §63.122(g)(2)]	During the reporting period, there were no occurrences when Condenser E-200 or E-200A monitored parameters were outside the established range.
7	For Group 1 Storage Vessels, if a flare is used, each occurrence when the flare does not meet the general control device requirements specified in §63.11(b) and the reason. [§63.506(e)(6)(iii)(A) and §63.122(g)(3)]	There are currently no Group 1 Storage Vessels at BRCP that use a flare to comply with Subpart U.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 1 Storage Vessels, continued		
8	For Group 1 Storage Vessels complying via a closed-vent system and control device, report results from each closed-vent system inspection when a leak was detected. [§63.506(e)(6)(iii)(A) and §63.148(j)(1)]	There were no leaks detected on the closed-vent system and control device (i.e. Condenser E-200 or E-200A) during the reporting period other than any applicable events listed with Item 25.
9	For Group 1 Storage Vessels complying via a closed-vent system and control device, report all recorded periods when • the vent stream was diverted from the control device through a bypass line, • the seal mechanism was broken, • the bypass line valve position changed, or • the key to unlock the bypass line valve was checked out. [§63.506(e)(6)(iii)(A) and §63.148(j)(2-3)]	There were no recorded periods when the vent stream from the control device was diverted through a bypass, the seal mechanism was broken, the bypass line valve position changed, or the key to unlock the bypass line valve was checked out.
Group 1 Continuous Front-End Process Vents		
10	The daily average values of monitored parameters for all excursions involving Group 1 Continuous Front-End Process Vents. For excursions caused by lack of monitoring data, specify the start time and duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(A-B), §63.505(i)(6), §63.118(f)(1-2), §63.118(f)(6),and §63.130(d)(1-2)]	There were no excursions for Group 1 Continuous Front-End Process Vents at BRCP during the reporting period. Per §63.505(i)(6), one excused excursion is allowed during the reporting period for each control or recovery device.
11	For Group 1 Continuous Front-End Process Vents, the times and durations of all periods recorded when the vent stream was diverted from the control device to the atmosphere through a bypass line. [§63.506(e)(6)(iii)(A), §63.118(f)(3), and §63.130(d)(3)]	There were no periods recorded when a Group 1 Continuous Front-End Process Vent at BRCP was diverted from a control device to the atmosphere through a bypass line during the reporting period. There are currently no bypass lines associated with Group 1 Continuous Front End Process Vents at BRCP.
12	For Group 1 Continuous Front-End Process Vents, all periods recorded in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out. [§63.506(e)(6)(iii)(A), §63.118(f)(4)]	There are currently no bypass lines associated with Group 1 Continuous Front End Process Vents at BRCP. Therefore, there were no periods in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out for any Group 1 Continuous Front-End Process Vents at BRCP during the reporting period.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 1 Continuous Front-End Process Vents, continued		
13	Beginning with the first periodic report required to be submitted by §63.506(e)(6) that is at least 13 months after the compliance date, the total mass of HCl emitted for each of the rolling 12-month periods in the reporting period divided by the total mass of elastomer produced during the corresponding 12-month period, determined in accordance with §63.485(q)(1)(v). *The associated emission limits were previously submitted October 18, 2011 as required, but are listed here for reference.* *RLA-1 twelve-month rolling average HCl limit* *= 1.35 X 10^{-3} tonne HCl/tonne Production* *RLA-3 twelve-month rolling average HCl limit* *= 3.16 X 10^{-4} tonne HCl/tonne Production*	As demonstrated by the following values, each applicable 12-month period complied with the associated 12-month rolling average for RLA-1 or RLA-3, respectively. RLA-1 twelve- month rolling average: • November 2020 = 0.88 X 10^{-3} tonne HCl/ tonne Production • December 2020 = 0.88 X 10^{-3} tonne HCl/ tonne Production • January 2021 = 0.79 X 10^{-3} tonne HCl/ tonne Production • February 2021 = 0.67 X 10^{-3} tonne HCl/ tonne Production • March 2021 = 0.64 X 10^{-3} tonne HCl/ tonne Production • April 2021 = 0.60 X 10^{-3} tonne HCl/ tonne Production RLA-3 twelve- month rolling average : • November 2020 = 1.82 X 10^{-4} tonne HCl / tonne Production • December 2020 = 1.69 X 10^{-4} tonne HCl / tonne Production • January 2021 = 1.71 X 10^{-4} tonne HCl / tonne Production • Feburary 2021 = 1.80 X 10^{-4} tonne HCl / tonne Production • March 2021 = 1.85 X 10^{-4} tonne HCl / tonne Production • April 2021 = 1.93 X 10^{-4} tonne HCl / tonne Production

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 1 Continuous Front-End Process Vents, continued		
14	For Group 1 Continuous Front-End Process Vents, the times and durations of all periods recorded in which all pilot flames of a flare were absent. [§63.506(e)(6)(iii)(A), §63.118(f)(5), and §63.130(d)(5)]	There were no known periods in which all pilot flames for a flare used as a control device for a Group 1 Continuous Front-End Process Vent at BRCP were absent during the reporting period.
15	For Group 1 Continuous Front-End Process Vents, a report of all times when an internal combustion engine was not operating while emissions were being routed to it. [§63.506(e)(6)(iii)(A), 63.485(s)(5)]	Internal combustion engines are not currently used as a control device for any Group 1 Continuous Front-End Process Vent at Halobutyl or Vistalon™.
Group 2 Continuous Front-End Process Vents		
16	For Group 2 Continuous Front-End Process Vents [§63.506(e)(6)(iii)(A), §63.117(a)(3-8), and §63.485(l)(1-5)]: • Description of any process changes that caused the TRE index value to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold. • Recalculation results and parameter monitoring results of any group determination (temperature, flow rate, organic HAP concentration, or TRE index value).	No process changes occurred at Halobutyl or Vistalon™ during this reporting period that caused the TRE Index Value of a vent stream to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold.
Back-End Process Operations		
17	The monthly weighted average residual organic HAP content for all excursions involving Back-End Process Operations. For excursions caused by lack of data, specify the start time and the duration of periods when samples were not collected. [§63.506(e)(6)(iii)(B), §63.505(i)(6), and §63.505(h)(1)]	There were no excursions for Back-End Process Operations at Vistalon™ during the reporting period. Per §63.505(i)(6), one excused excursion is allowed during the reporting period for each control or recovery device.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Back-End Process Operations, continued		
18	For Back-End Process Operations using a control or recovery device to comply with §63.493 – 63.500, submit the compliance re-determination report required by §63.499(d) within 180 days of the process change that would reasonably be expected to impair the performance of the control/recovery device. [§63.506(e)(7)(iii), §63.499(d), and §63.496(d)]	Compliance with applicable Back-End Process Operation provisions is achieved via stripping technology and not via control or recovery equipment at Vistalon™. No applicable process changes are known to have occurred during the reporting period.
19	Beginning with the first periodic report required to be submitted by §63.506(e)(6) that is at least 13 months after the compliance date, the total mass of organic HAP emitted for each of the rolling 12-month periods in the reporting period divided by the total mass of elastomer produced during the corresponding 12-month period, determined in accordance with §63.495(g)(5). Submit the back-end emission limitation in accordance with §63.499(f)(1). Re-determine the compliance status in accordance with §63.499(d) whenever applicable process changes are made. [§63.494(a)(4), §63.499(d), §63.499(f)(1), and §63.496(d)] *The back-end emission limitation was previously submitted 10/18/11, as required, but is listed here for reference.* *HFU twelve-month rolling average n-Hexane limit = 5.31 X 10^{-4} tonne n-Hexane/tonne Production*	As demonstrated by the following values, each applicable 12-month period complied with associated 12-month rolling average for HFU. HFU twelve-month rolling average: • November 2020 = 2.46 X 10^{-4} tonnes n-Hexane / tonne Production • December 2020 = 3.12 X 10^{-4} tonnes n-Hexane / tonne Production • January 2021 = 2.97 X 10^{-4} tonnes n-Hexane / tonne Production • Feburary 2021 = 2.95 X 10^{-4} tonnes n-Hexane / tonne Production • March 2021 = 2.92 X 10^{-4} tonnes n-Hexane / tonne Production • April 2021 = 2.85 X 10^{-4} tonnes n-Hexane / tonne Production

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Surge Control Vessels / Bottoms Receivers		
20	The compliance option selected under §63.172(n), if applicable. [§63.506(e)(6), §63.502(g), §63.182(a)(3), §63.182(d)(2)(xiv), and §63.172(n)]	None of the control devices used to demonstrate compliance with 40 CFR 63, Subpart U at BRCP are currently subject to 40 CFR Parts 264/265, Subpart BB.
Group 1 Process Wastewater Streams		
21	Information regarding Group 1 Process Wastewater Streams. [§63.146(c), (d), (e), and (g)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
22	For Group 1 Process Wastewater Streams transferred for treatment by another party in accordance with §63.132(g), report any changes in the identity of the treatment facility or the transferee. [§63.506(e)(6)(iii)(D)(5)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
23	The daily average values of monitored parameters for all excursions involving Group 1 Process Wastewater Streams. For excursions caused by lack of monitoring data, specify the start time and the duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(B) and §63.505(g)(1)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
Heat Exchange Systems		
24	Any delay of repair information for HON heat exchange systems. [§63.506(e)(6)(iii)(A), §63.502(n)(5), §63.104(b)(4) and §63.104(f)(2)]	No leaks of organic HAP listed in Table 5 to Subpart U were detected that required use of the delay of repair provisions in any heat exchange system subject to the requirements of §63.502(n).

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Startup, Shutdown, and Malfunction (S/S/M) Plan		
25	Semiannual startup, shutdown, and malfunction required information: The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.483(a)(1), including actions taken to correct a malfunction. Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant standard. [§63.506(e)(6)(iii)(E) and §63.506(b)(1)(ii) referencing §63.10(d)(5)(i)]	Actions at BRCP during startup, shutdown, and malfunction events in the reporting period were consistent with the Startup, Shutdown, and Malfunction (SSM) Plan. Known, applicable malfunctions (per the definition in 40 CFR 63.2) of Group 1 process equipment, continuous monitoring systems, air pollution control equipment, or a process unit which occurred at BRCP during the reporting period are listed in Table II. The SSM Plan was updated August 7, 2020 to reflect equipment/procedure changes for MON MACT.
Emission Averaging Plan		
26	Any supplements to the Emission Averaging Plan. [§63.506(e)(6)(iii)(D)(1) and §63.506(e)(4)(iii-iv)]	Halobutyl and Vistalon™ do not currently use an Emission Averaging Plan to demonstrate compliance with 40 CFR 63 Subpart U.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group Determinations and Process Changes		
27	Supplemental data for any group status change, change in compliance method, new emission point(s) or revisions to the Notification of Compliance Status (NCS). [§63.506(e)(6)(iii)(D)(2-4), §63.506(e)(7), §63.502(g), §63.182(a)(3), and §63.182(d)(4)]	There were no known new MACT emission points and no other known changes in the group status or compliance method of any existing MACT emission point at Halobutyl and Vistalon™ during the reporting period.
28	Information concerning any performance test or group determination completed during the reporting period. [§63.506(e)(6)(v), §63.506(e)(5)(i)(B), §63.504(c), and §63.117(a)(3-8)]	No TRE recalculations or performance tests were performed to comply with Subpart U at Halobutyl and Vistalon™ during the reporting period.
29	Notification of a change in the primary product of an EPPU (including a change from one elastomer product to another elastomer or non-elastomer product). [§63.506(e)(6)(vi), §63.506(e)(7)(iv), and §63.480(f)]	No primary product changes occurred at Halobutyl or Vistalon™ during the reporting period. The primary products for these EPPUs are halobutyl rubber and ethylene propylene rubber, respectively.
30	Results for each change in a predominant use determination made under §63.480(g) for a storage vessel. [§63.506(e)(6)(vii) and §63.480(g)]	No changes occurred in predominant use determinations for storage vessels at Halobutyl or Vistalon™ during the reporting period.
31	Results for each change in a predominant use determination made under §63.480(h) for recovery operations equipment. [§63.506(e)(6)(viii) and §63.480(h)]	No changes occurred in predominant use determinations for recovery operations equipment at Halobutyl or Vistalon™ during the reporting period.
32	Information regarding the reduced recordkeeping program, if used to demonstrate compliance. [§63.506(e)(6)(ix-x) and §63.506(h)]	The reduced recordkeeping program is not currently being used to demonstrate compliance at Halobutyl or Vistalon™.

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P.O. Box 241
Baton Rouge, LA 70821

David A. Luecke
Site Manager

ExxonMobil

January 14, 2022

Hand Delivered

LDEQ RECEIPT
2022 JAN 14 AM 11:32

Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: Group I Polymers and Resins NESHAP Semiannual Report
ExxonMobil Chemical Company, Baton Rouge Chemical Plant
Agency Interest No. 286

Dear Sir or Madam:

As required by 40 CFR 63.506(e)(6), the owner or operator of an affected facility shall submit semiannual reports to the LDEQ for elastomer product process units (EPPUs) subject to 40 CFR 63 Subpart U. This semiannual report covers the period from May 17, 2021 through November 16, 2021, for the two EPPUs at the ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP), AI No. 286. The two EPPUs are the Halobutyl Polymerization and Finishing Unit (RLA-1/HFU or Halobutyl) and the Vistalon™ Polymerization and Finishing Unit (RLA-3/VFU or Vistalon™).

The attached Table I contains the applicable, required information for Halobutyl and Vistalon™. There are currently no batch front-end process vents or aggregate batch vent streams subject to Subpart U at BRCP. Except for information regarding the SSM Plan and surge control vessels / bottoms receivers included with this submittal, equipment subject to 40 CFR Part 63 Subpart H is covered in a separate semiannual report.

If you need more information, please call Michelle Torelli at (346) 335-0852.

I certify under provisions of Louisiana and United States law which provide criminal penalties for false statements that based on information and belief formed after reasonable inquiry the statements and information contained in this report are true, accurate, and complete.

Sincerely,

Jessica Scaggs for Dave Luecke

Dave Luecke
BRCP Site Manager

c: April Wallace, LDEQ Capital Regional Office — Hand Delivered

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ENV4000

TABLE I
Group I Polymers & Resins NESHAP

40 CFR 63.506(e)(6) requires the reporting of the following:

No.	Reporting Requirement	Response
Group 1 Storage Vessels		
1	For Group 1 Storage Vessels, information regarding the occurrence of any control equipment, seal gap, or seal failure. [§63.506(e)(6)(iii)(A), §63.122(d)(1)(ii), §63.122(d)(2)(ii), §63.122(d)(3)(ii), §63.122(e)(1, 3), and §63.122(f)]	There were no known occurrences of control equipment, seal gap, or seal failure during this reporting period for Group 1 Storage Vessels subject to Subpart U at BRCP, except any applicable event listed in Item 25.
2	For Group 1 Storage Vessels, information regarding any extension used to repair or empty a tank. [§63.506(e)(6)(iii)(A), §63.122(d)(1)(iii), §63.122(e)(2), §63.122(f), and §63.120(a)(4)]	No extensions were needed to repair or empty any Group 1 Storage Vessels subject to Subpart U at BRCP during the reporting period.
3	The daily average values of monitored parameters for all excursions involving Group 1 Storage Vessels. For excursions caused by lack of monitoring data, specify the start time and the duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(B)]	It was declared on August 26, 2021 that a state of emergency exists in the State of Louisiana due to Hurricane Ida. On August 30, 2021, the Baton Rouge Chemical Plant began to safely shutdown operations because nitrogen supply was curtailed due to hurricane impacts to third party nitrogen-producing facilities. Loss of vapor recovery systems for storage tanks T-1976, T-1977, and T-1978. As part of a unit's restart process, the nitrogen blankets were restored to tanks associated with that unit's operations. This resulted in 982.8 lbs of VOC and 591 lbs of n-hexane emissions over a seven day period. This is being claimed as an excused excursion. Per §63.505(i)(6), one excused excursion is allowed during the reporting period for each control or recovery device.
4	For Group 1 Storage Vessels, a description (i.e. type, planned frequency, length) of the planned routine maintenance anticipated to be performed for a control device during the next semiannual reporting period that would require it not to meet §63.119(e)(1) or (e)(2), as applicable. [§63.506(e)(6)(iii)(A), §63.122(g)(1)(i), §63.120(d)(4), and §63.120(e)(3)]	There are currently no maintenance activities planned for Condenser E-200 or E-200A during the next semiannual reporting period that would require them not to meet applicable requirements of §63.119(e)(1) or (e)(2).
5	For Group 1 Storage Vessels, a description of the planned routine maintenance performed for a control device during the most recent semiannual reporting period that required it not to meet §63.119(e)(1) or (e)(2), as applicable. Include the total number of hours the control device did not meet §63.119(e)(1) or (e)(2), as applicable. [§63.506(e)(6)(iii)(A), §63.122(g)(1)(ii), §63.120(d)(4), and §63.120(e)(3)]	There were no times recorded during the reporting period during which Condenser E-200 or E-200A did not meet the applicable requirements of §63.119(e)(1) or (e)(2) due to planned routine maintenance.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 1 Storage Vessels, continued		
6	For Group 1 Storage Vessels, if a control device other than a flare is used, list each occurrence for the control device when the monitored parameter(s) were outside the established ranges as well as the cause. [§63.506(e)(6)(iii)(A) and §63.122(g)(2)]	Other than events described in Report Requirement 3, there were no other occurrences when Condenser E-200 or E-200A monitored parameters were outside the established range.
7	For Group 1 Storage Vessels, if a flare is used, each occurrence when the flare does not meet the general control device requirements specified in §63.11(b) and the reason. [§63.506(e)(6)(iii)(A) and §63.122(g)(3)]	There are currently no Group 1 Storage Vessels at BRCP that use a flare to comply with Subpart U.
8	For Group 1 Storage Vessels complying via a closed-vent system and control device, report results from each closed-vent system inspection when a leak was detected. [§63.506(e)(6)(iii)(A) and §63.148(j)(1)]	There were no leaks detected on the closed-vent system and control device (i.e. Condenser E-200 or E-200A) during the reporting period other than any applicable events listed with Item 25.
9	For Group 1 Storage Vessels complying via a closed-vent system and control device, report all recorded periods when • the vent stream was diverted from the control device through a bypass line, • the seal mechanism was broken, • the bypass line valve position changed, or • the key to unlock the bypass line valve was checked out. [§63.506(e)(6)(iii)(A) and §63.148(j)(2-3)]	There were no recorded periods when the vent stream from the control device was diverted through a bypass, the seal mechanism was broken, the bypass line valve position changed, or the key to unlock the bypass line valve was checked out.
Group 1 Continuous Front-End Process Vents		
10	The daily average values of monitored parameters for all excursions involving Group 1 Continuous Front-End Process Vents. For excursions caused by lack of monitoring data, specify the start time and duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(A-B), §63.505(i)(6), §63.118(f)(1-2), §63.118(f)(6),and §63.130(d)(1-2)]	There were no excursions for Group 1 Continuous Front-End Process Vents at BRCP during the reporting period. Per §63.505(i)(6), one excused excursion is allowed during the reporting period for each control or recovery device.
11	For Group 1 Continuous Front-End Process Vents, the times and durations of all periods recorded when the vent stream was diverted from the control device to the atmosphere through a bypass line. [§63.506(e)(6)(iii)(A), §63.118(f)(3), and §63.130(d)(3)]	There were no periods recorded when a Group 1 Continuous Front-End Process Vent at BRCP was diverted from a control device to the atmosphere through a bypass line during the reporting period. There are currently no bypass lines associated with Group 1 Continuous Front End Process Vents at BRCP.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 1 Continuous Front-End Process Vents, continued		
12	For Group 1 Continuous Front-End Process Vents, all periods recorded in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out. [§63.506(e)(6)(iii)(A), §63.118(f)(4)]	There are currently no bypass lines associated with Group 1 Continuous Front End Process Vents at BRCP. Therefore, there were no periods in which the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out for any Group 1 Continuous Front-End Process Vents at BRCP during the reporting period.
13	Beginning with the first periodic report required to be submitted by §63.506(e)(6) that is at least 13 months after the compliance date, the total mass of HCl emitted for each of the rolling 12-month periods in the reporting period divided by the total mass of elastomer produced during the corresponding 12-month period, determined in accordance with §63.485(q)(1)(v). *The associated emission limits were previously submitted October 18, 2011 as required, but are listed here for reference.* *RLA-1 twelve-month rolling average HCl limit* *= 1.35 X 10^{-3} tonne HCl/tonne Production* *RLA-3 twelve-month rolling average HCl limit* *= 3.16 X 10^{-4} tonne HCl/tonne Production*	As demonstrated by the following values, each applicable 12-month period complied with the associated 12-month rolling average for RLA-1 or RLA-3, respectively. RLA-1 twelve- month rolling average: • May 2021 = 0.79 X 10^{-3} tonne HCl/ tonne Production • June 2021 = 0.34 X 10^{-3} tonne HCl/ tonne Production • July 2021 = 0.31 X 10^{-3} tonne HCl/ tonne Production • August 2021 = 0.30 X 10^{-3} tonne HCl/ tonne Production • September 2021 = 0.24 X 10^{-3} tonne HCl/ tonne Production • October 2021 = 0.25 X 10^{-3} tonne HCl/ tonne Production RLA-3 twelve- month rolling average : • May 2021 = 2.15 X 10^{-4} tonne HCl / tonne Production • June 2021 = 2.08 X 10^{-4} tonne HCl / tonne Production • July 2021 = 2.02 X 10^{-4} tonne HCl / tonne Production • August 2021 = 2.05 X 10^{-4} tonne HCl / tonne Production • September 2021 = 2.09 X 10^{-4} tonne HCl / tonne Production • October 2021 = 2.16 X 10^{-4} tonne HCl / tonne Production
14	For Group 1 Continuous Front-End Process Vents, the times and durations of all periods recorded in which all pilot flames of a flare were absent. [§63.506(e)(6)(iii)(A), §63.118(f)(5), and §63.130(d)(5)]	There were no known periods in which all pilot flames for a flare used as a control device for a Group 1 Continuous Front-End Process Vent at BRCP were absent during the reporting period.
15	For Group 1 Continuous Front-End Process Vents, a report of all times when an internal combustion engine was not operating while emissions were being routed to it. [§63.506(e)(6)(iii)(A), 63.485(s)(5)]	Internal combustion engines are not currently used as a control device for any Group 1 Continuous Front-End Process Vent at Halobutyl or Vistalon™.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Group 2 Continuous Front-End Process Vents		
16	For Group 2 Continuous Front-End Process Vents [§63.506(e)(6)(iii)(A), §63.117(a)(3-8), and §63.485(l)(1-5)]: • Description of any process changes that caused the TRE index value to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold. • Recalculation results and parameter monitoring results of any group determination (temperature, flow rate, organic HAP concentration, or TRE index value).	No process changes occurred at Halobutyl or Vistalon™ during this reporting period that caused the TRE Index Value of a vent stream to cross the 1.0 or 4.0 thresholds, raised the flow above the 0.005 cubic meter threshold, or increased the HAP concentration above the 50 ppm_v threshold.
Back-End Process Operations		
17	The monthly weighted average residual organic HAP content for all excursions involving Back-End Process Operations. For excursions caused by lack of data, specify the start time and the duration of periods when samples were not collected. [§63.506(e)(6)(iii)(B), §63.505(i)(6), and §63.505(h)(1)]	There were no excursions for Back-End Process Operations at Vistalon™ during the reporting period. Per §63.505(i)(6), one excused excursion is allowed during the reporting period for each control or recovery device.
18	For Back-End Process Operations using a control or recovery device to comply with §63.493 – 63.500, submit the compliance re-determination report required by §63.499(d) within 180 days of the process change that would reasonably be expected to impair the performance of the control/recovery device. [§63.506(e)(7)(iii), §63.499(d), and §63.496(d)]	Compliance with applicable Back-End Process Operation provisions is achieved via stripping technology and not via control or recovery equipment at Vistalon™. No applicable process changes are known to have occurred during the reporting period.
19	Beginning with the first periodic report required to be submitted by §63.506(e)(6) that is at least 13 months after the compliance date, the total mass of organic HAP emitted for each of the rolling 12-month periods in the reporting period divided by the total mass of elastomer produced during the corresponding 12-month period, determined in accordance with §63.495(g)(5). Submit the back-end emission limitation in accordance with §63.499(f)(1). Re-determine the compliance status in accordance with §63.499(d) whenever applicable process changes are made. [§63.494(a)(4), §63.499(d), §63.499(f)(1), and §63.496(d)] *The back-end emission limitation was previously submitted 10/18/11, as required, but is listed here for reference.* *HFU twelve-month rolling average n-Hexane limit* *= 5.31 X 10^{-4} tonne n-Hexane/tonne Production*	As demonstrated by the following values, each applicable 12-month period complied with associated 12-month rolling average for HFU. HFU twelve-month rolling average: • May 2021 = 2.95 X 10-4 tonnes n-Hexane / tonne Production • June 2021 = 2.96 X 10-4 tonnes n-Hexane / tonne Production • July 2021 = 3.03 X 10-4 tonnes n-Hexane / tonne Production • August 2021 = 3.06 X 10-4 tonnes n-Hexane / tonne Production • September 2021 = 3.12 X 10-4 tonnes n-Hexane / tonne Production • October 2021 = 3.06 X 10-4 tonnes n-Hexane / tonne Production

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Surge Control Vessels / Bottoms Receivers		
20	The compliance option selected under §63.172(n), if applicable. [§63.506(e)(6), §63.502(g), §63.182(a)(3), §63.182(d)(2)(xiv), and §63.172(n)]	None of the control devices used to demonstrate compliance with 40 CFR 63, Subpart U at BRCP are currently subject to 40 CFR Parts 264/265, Subpart BB.
Group 1 Process Wastewater Streams		
21	Information regarding Group 1 Process Wastewater Streams. [§63.146(c), (d), (e), and (g)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
22	For Group 1 Process Wastewater Streams transferred for treatment by another party in accordance with §63.132(g), report any changes in the identity of the treatment facility or the transferee. [§63.506(e)(6)(iii)(D)(5)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
23	The daily average values of monitored parameters for all excursions involving Group 1 Process Wastewater Streams. For excursions caused by lack of monitoring data, specify the start time and the duration of periods when monitoring data were not collected. [§63.506(e)(6)(iii)(B) and §63.505(g)(1)]	There are currently no Group 1 Process Wastewater Streams at BRCP.
Heat Exchange Systems		
24	Any delay of repair information for HON heat exchange systems. [§63.506(e)(6)(iii)(A), §63.502(n)(5), §63.104(b)(4) and §63.104(f)(2)]	No leaks of organic HAP listed in Table 5 to Subpart U were detected that required use of the delay of repair provisions in any heat exchange system subject to the requirements of §63.502(n).
Startup, Shutdown, and Malfunction (S/S/M) Plan		
25	Semiannual startup, shutdown, and malfunction required information: The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.483(a)(1), including actions taken to correct a malfunction. Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant standard. [§63.506(e)(6)(iii)(E) and §63.506(b)(1)(ii) referencing §63.10(d)(5)(i)]	Actions at BRCP during startup, shutdown, and malfunction events in the reporting period were consistent with the Startup, Shutdown, and Malfunction (SSM) Plan. Known, applicable malfunctions (per the definition in 40 CFR 63.2) of Group 1 process equipment, continuous monitoring systems, air pollution control equipment, or a process unit which occurred at BRCP during the reporting period are listed in Table II. The SSM Plan was updated August 7, 2020 to reflect equipment/procedure changes for MON MACT.

TABLE I
Group I Polymers & Resins NESHAP

No.	Reporting Requirement	Response
Emission Averaging Plan		
26	Any supplements to the Emission Averaging Plan. [§63.506(e)(6)(iii)(D)(1) and §63.506(e)(4)(iii-iv)]	Halobutyl and Vistalon™ do not currently use an Emission Averaging Plan to demonstrate compliance with 40 CFR 63 Subpart U.
Group Determinations and Process Changes		
27	Supplemental data for any group status change, change in compliance method, new emission point(s) or revisions to the Notification of Compliance Status (NCS). [§63.506(e)(6)(iii)(D)(2-4), §63.506(e)(7), §63.502(g), §63.182(a)(3), and §63.182(d)(4)]	There were no known new MACT emission points and no other known changes in the group status or compliance method of any existing MACT emission point at Halobutyl and Vistalon™ during the reporting period.
28	Information concerning any performance test or group determination completed during the reporting period. [§63.506(e)(6)(v), §63.506(e)(5)(i)(B), §63.504(c), and §63.117(a)(3-8)]	No TRE recalculations or performance tests were performed to comply with Subpart U at Halobutyl and Vistalon™ during the reporting period.
29	Notification of a change in the primary product of an EPPU (including a change from one elastomer product to another elastomer or non-elastomer product). [§63.506(e)(6)(vi), §63.506(e)(7)(iv), and §63.480(f)]	No primary product changes occurred at Halobutyl or Vistalon™ during the reporting period. The primary products for these EPPUs are halobutyl rubber and ethylene propylene rubber, respectively.
30	Results for each change in a predominant use determination made under §63.480(g) for a storage vessel. [§63.506(e)(6)(vii) and §63.480(g)]	No changes occurred in predominant use determinations for storage vessels at Halobutyl or Vistalon™ during the reporting period.
31	Results for each change in a predominant use determination made under §63.480(h) for recovery operations equipment. [§63.506(e)(6)(viii) and §63.480(h)]	No changes occurred in predominant use determinations for recovery operations equipment at Halobutyl or Vistalon™ during the reporting period.
32	Information regarding the reduced recordkeeping program, if used to demonstrate compliance. [§63.506(e)(6)(ix-x) and §63.506(h)]	The reduced recordkeeping program is not currently being used to demonstrate compliance at Halobutyl or Vistalon™.

Table II
Summary of Applicable SSM Events
Group I Polymers & Resins NESHAP

Date	EPPU	Event Type (Startup, Shutdown, or Malfunction)	Duration	Brief Event Description (Specify which control device or continuous monitoring system involved)
7/19/2021	16 FLARE[1]	Malfunction	10.97 minutes	On Monday, July 19th 2021, BRCP's Flare #16 had a visible emissions for a total of 10 minutes and 58 seconds, over a span of ~16 minutes. Initial cause of the smoking can be contributed to a composition change to the flare stack requiring manual intervention of additional steam.
7/27/2021	25 FLARE[1]	Malfunction	6.57 minutes	On July 27th, BRCP Flares 25 and 10 had visible emissions due to a complex wide reduction in available steam. The root cause was loss of steam production at third party supplier (LA Station).
	10 FLARE[1]	Malfunction	17.37 minutes	
10/6/2021	16 FLARE[1]	Malfunction	23.18 minutes	On October 6th, BRCP Flares #16 and #26 incurred greater than 5 minutes of visible emissions due to loss of steam to the BRCP flare system. The root cause was incorrect valve isolation.
	26 FLARE[1]	Malfunction	44.58 minutes	

[1]The BRCP Flare System is a control device for a Subpart U Surge Control Vessel and several Group 1 Continuous Front-End Process Vents.

ExxonMobil
Baton Rouge Chemical Plant
MON Semiannual Report
August 2021

ExxonMobil Chemical Company
Baton Rouge Chemical Plant
P.O. Box 241
Baton Rouge, LA 70821

David A. Luecke
Site Manager

ExxonMobil

August 25, 2021

HAND DELIVERED

Office of Environmental Compliance
Louisiana Department of Environmental Quality
P. O. Box 4312
Baton Rouge, LA 70821-4312

Re: MON Semiannual Compliance Report
ExxonMobil Chemical Company, Baton Rouge Chemical Plant
BRCP Agency Interest No. 286

Dear Sir or Madam:

ExxonMobil Chemical Company, Baton Rouge Chemical Plant (BRCP) has several process units subject to the Miscellaneous Organic NESHAP (MON) [40 CFR Part 63, Subpart FFFF]. The MON affected source at BRCP is an existing affected source.

The attached tables contain the requested information as applicable to the facilities at BRCP for the reporting period of January 1, 2021 through June 30, 2021. The updated Notification of Compliance Status (NCS) is also included.

If you have questions or need more information, please call Laura McKenna at (225) 540-0141.

I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this report are true, accurate, and complete.

Sincerely,

c: April Baiamonte, LDEQ Capital Regional Office

CP 5.9.03.20.002
ENV4000

TABLE I
MON Reporting Requirements

The compliance report must contain the information specified in §63.2520(e)(1-10). Per §63.2520(e)(9), any records and information for periodic reports specified in referenced Subparts F, G, H, SS, UU, WW, and GGG of 40 CFR Part 63 are included as applicable in the following pages. Note that 40 CFR 65, Subpart F is not currently applicable to BRCP MON Sources.

No.	Reporting Requirement	Response
General Information		
1	Include the following information: (1) Company name and address. (2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report. (3) Date of report and beginning and ending dates of the reporting period. [§63.2520(e)(1-3)]	The Exxon Mobil Corporation owns and operates the following facility for purposes of Part 63, Subpart FFFF: Baton Rouge Chemical Plant 4999 Scenic Highway Baton Rouge, LA 70805 The certification required by §63.2520(e)(2) is included in the cover letter. This is the Compliance Report required by §63.2520(e) for January 1, 2021 through June 30, 2021.
Startup, Shutdown, and Malfunction Plan		
2	For each SSM during which excess emissions occurred, either include records that the procedures specified in the applicable startup, shutdown, and malfunction plan were followed or documentation of actions not consistent with the plan. Include a brief description of each malfunction. [§63.2520(e)(4)]	Actions at BRCP for applicable equipment associated with the MON during startup, shutdown, and malfunction events in the reporting period were consistent with the Startup, Shutdown, and Malfunction (SSM) Plan. Other information required to be reported by §63.2520(e)(4) is listed in Table II.
Deviations		
3	If there were no deviations from any emission limit, operating limit, or work practice standard in Subpart FFFF, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period. [§63.2520(e)(5)(i)]	Per §63.2550, *deviation* means any instance in which an affected source subject to 40 CFR 63, Subpart FFFF or an owner or operator of such a source: (1) Fails to meet any requirement or obligation established by Subpart FFFF including (but not limited to) any emission limit, operating limit, or work practice standard. *These deviations are reported in Table III.* (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in Subpart FFFF and that is included in the operating permit for any affected source required to obtain such a permit. *These deviations are reported in Table III.* (3) Fails to meet any emission limit, operating limit, or work practice standard in Subpart FFFF during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by Subpart FFFF. *SSM events with excess emissions are reported in Table II.*

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Deviations, continued		
4	For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source NOT using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, include the following information (including periods of SSM): (A) Total affected source operating time in reporting period. (B) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and associated corrective actions. (C) Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks. [§63.2520(e)(5)(ii)]	Information required to be reported by §63.2520(e)(5)(ii) is reported in Tables II and III. No known deviations of Group 1 Batch Process Vents occurred during the reporting period that would require the submittal of operating logs.
5	For each deviation from an emission limit or operating limit occurring at an affected source using a CMS to comply with an emission limit in Subpart FFFF, include the following information (including periods of SSM): (A) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks. (B) The date, time, and duration that each CEMS was out-of-control, including the information in §63.8(c)(8). (C) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period. (D) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total operating time of the affected source during that reporting period. (E) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes. (F) A summary of the total duration of CMS downtime during the reporting period, and total duration of CMS downtime as a percent of total operating time of affected source during that reporting period. (G) Identification of each HAP known to be in the emission stream. (H) A brief description of the process units. (I) A brief description of the CMS. (J) The date of the latest CMS certification or audit. (K) Operating logs of processes with batch vents from batch operations for each day(s) during which the deviation occurred. (L) The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred. [§63.2520(e)(5)(iii)]	There were no deviations from an emission limit or operating limit (including periods of SSM) that occurred at an affected source using a CMS to comply with an emission limit in the compliance reporting period.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Deviations, continued		
6	If a CEMS is used to comply with Subpart FFFF, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period. [§63.2520(e)(6)]	During the reporting period, no MON Group 1 Sources at BRCP used a CEMS to comply with Subpart FFFF. Therefore, this requirement is not applicable.
Process Changes		
7	Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For reporting purposes, a revised operating scenario for an existing process is considered to be a new operating scenario. For reporting purposes, a change to any of the following items not previously reported constitutes a new operating scenario: ♦ A description of the process and the type of process equipment used. ♦ An identification of related process vents, including their associated emissions episodes if not complying with the alternative standard in §63.2505; wastewater point of determination (POD); storage tanks; and transfer racks. ♦ The applicable control requirements of this subpart, including the level of required control, and for vents, the level of control for each vent. ♦ The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device. ♦ The applicable monitoring requirements of this subpart and any parametric level that assures compliance for all emissions routed to the control device or treatment process. ♦ Calculations and engineering analyses required to demonstrate compliance. [§63.2520(e)(7), §63.2525(b)]	No new operating scenarios have been operated since the time period covered by the last compliance report which have not been submitted in the notification of compliance status report or a previous compliance report.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Process Changes, continued		
8	Include records of process units added to a process unit group as specified in §63.2525(i)(4) and records of primary product redeterminations as specified in §63.2525(i)(5). [63.2520(e)(8)]	Process unit groups were not used to comply with the MON at BRCP during the reporting period.
9	For any process change, or change in any of the information submitted in the notification of compliance status report or a previous compliance report, that is not within the scope of an existing operating scenario, document the change in the compliance report. A process change does not include moving within a range of conditions identified in the standard batch, and a nonstandard batch does not constitute a process change. The notification must include all of the following information. (A) A description of the process change. (B) Revisions to any of the information reported in the original notification of compliance status report. (C) Information required by the notification of compliance status report for changes involving the addition of processes or equipment at the affected source. [§63.2520(e)(10(i))]	The following revisions were made to the NCS (August 2021): Section I. MCPUs and Operating Scenarios • C5/C10 Neo Acid MCPU – o Source T-1960,A was added as a Group 2 Surge Control Vessel • Cobalt Catalyst MCPU – o Updated MCPU to include increased number of batches and higher methanol percentage
10	Submit a report 60 days before the scheduled implementation date of any of the following changes. (A) Any change to the information contained in the precompliance report. (B) A change in the status of a control device from small to large. (C) A change from Group 2 to Group 1 for any emission point except for batch process vents that meet the conditions specified in §63.2460(b)(6)(i). [§63.2520(e)(10(ii))]	None of these specific changes occurred during the reporting period at BRCP

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Process Changes, continued		
11	For replacement of existing control or recovery device: May use periodic report to notify Administrator before implementing the change. [§63.999(c)(7), §63.997(c)(3)]	Not currently planning to replace any existing control or recovery device needed to demonstrate compliance with MON emission control requirements for which a Title V Permit Application has not been submitted.
Process Vents That Emit Hydrogen Halide or Halide HAP		
12	If you documented in your notification of compliance status report that an MCPU has Group 2 Batch Process Vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold. [§63.2520(e)(5)(iv), §63.2460(b)(7)]	The HAP usage thresholds were not applicable to MON Sources at BRCP during the reporting period. Currently, two MCPUs at BRCP are complying with the hydrogen halide emission threshold of < 1000 lbs/yr. This threshold was not exceeded during the reporting period.
Group 2 Batch Process Vents		
13	Report any switch from Group 2 to Group 1 at least 60 days (unless have demonstrated compliance with the 10,000 lb limit for 1 year) before making the switch and include a copy of the applicable test report. [§63.2460(b)(6)(i-ii)]	There were no Group 2 Batch Process Vents during the reporting period that were switched to Group 1.
Group 1 Storage Tanks, Surge Control Vessels, and Bottoms Receivers		
14	Include the reporting period dates, the total source operating time for the reporting period, and, as applicable, all information specified in this section and in the referencing subpart, including periods when monitored parameters were outside their established ranges. [§63.999(c)(1)]	The reporting period dates and the total source operating times for the reporting period for sources subject to Part 63 Subpart SS are included in Table IV. Any periods when monitored parameters were outside their established ranges are reported under the different source categories in this report.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Group 1 Storage Tanks, Surge Control Vessels, and Bottoms Receivers, continued		
15	For storage vessels, transfer racks, and process vents routed to a non-flare control device: Describe each occurrence when the monitored parameters were outside the parameter ranges documented in the NCS, including the daily average value(s) and any applicable carbon-bed regeneration cycles. Identify the control device, the cause of the excursion, and duration of periods when monitoring data insufficient (if applicable). [§63.999(c)(5) and (6)(i-iii)]	All MON Group 1 Continuous Process Vents at this site vent to a flare or are introduced to a process heater with the primary fuel. All MON Group 1 Storage Tanks, Surge Control Vessels, and Bottoms Receivers that require emission control at this site vent to a flare or a fuel gas system. All transfer racks subject to the MON at this site are currently Group 2. Therefore, this requirement is not currently applicable.
16	*For Group 1 Storage Tanks routed to a closed-vent system & control device:* ◆ For the 6-month period covered by the periodic report, a description of the planned routine maintenance performed on the control system during which applicable specifications of §63.983(a), §63.985(a), or §63.987(a) were not met due to the maintenance. ◆ The first time of day and date the requirements of §63.983(a), §63.985(a), or §63.987(a), as applicable, were not met at the beginning of the planned routine maintenance. ◆ The first time of day and date the requirements of §63.983(a), §63.985(a), or §63.987(a), as applicable, were met at the conclusion of the planned routine maintenance. [§63.999(c)(4)(i)]	The Group 1 Storage Tanks connected to the OXO Tankfield Vapor Recovery System comply with §63.984 in accordance with Table 4.1.a.iii. of the MON (Subpart FFFF). Per §63.2470(d), periods of planned routine maintenance for each control device during which the control device does not meet the emission limits specified in Table 4 must not exceed 240 hours per year. Therefore, the information required by §63.999(c)(4)(i -iii) is normally reported here for the Group 1 Storage Tanks that vent to the BRRF Fuel Gas System via the OXO Tankfield Vapor Recovery System. There was no planned maintenance conducted during the 6-month period covered by the periodic report (January 1, 2021 – June 30, 2021) in which the control system for Group 1 Tanks (OXO Alcohol MCPU and OXO Olefin MCPU) on the OXO Vapor Recovery System did not meet the emissions limits in Table 4.1.a.iii. Any other known periods during the reporting period when a control system did not meet the requirements of §63.983(a), §63.985(a), or §63.987(a) [for reasons other than planned, routine maintenance] would be listed in Table II.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Group 1 Storage Tanks, Surge Control Vessels, and Bottoms Receivers, continued		
17	*For Group 1 Storage Tanks routed to a closed-vent system & control device:* For the time period covered by the periodic report and the previous periodic report, the total number of hours that the control system did not meet the requirements of §63.983(a), §63.985(a), or §63.987(a) due to planned, routine maintenance. [§63.999(c)(4)(ii)]	As stated in reporting Item No. 16, the OXO Tankfield Vapor Recovery System for Group 1 Storage Tanks was down for planned maintenance during the time period covered by the periodic report (January 1, 2021 – June 30, 2021). The total number of hours that the control system, OXO Tankfield Vapor Recovery System did not meet the requirements of §63.983(a), §63.985(a), or §63.987(a) due to planned, routine maintenance during this time period was 16.08 hours.
18	*For Group 1 Storage Tanks routed to a closed-vent system & control device*: A description of the planned routine maintenance anticipated to be performed on the control system during the next six month reporting period when it is not expected to meet the required control efficiency. The description shall include the type of maintenance, planned frequency, and expected length. [§63.999(c)(4)(iii)]	No other planned maintenance is anticipated to be performed on the OXO Tankfield Vapor Recovery System where the control system would not meet the requirements in 63.983(a), §63.985(a), or §63.987(a) or would result in excess emissions. In addition, there is no planned maintenance scheduled to be performed on the vapor recovery system servicing the MON Group 1 Storage Tanks in the Resins MCPU during the next reporting period.
19	*For Group 1 Storage Tanks routed to a closed-vent system & control device*: May apply for an extension of the time when emission limits do not apply from 240 hours per year to 360 hours per year. Include the information required in §63.2470(d). [§63.2470(d)]	BRCP is not requesting an extension at this time.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Group 1 Storage Tanks, Surge Control Vessels, and Bottoms Receivers, continued		
20	*For Group 1 Storage Tanks equipped with an internal or external floating roof:* Report the following information, as applicable, in the periodic report. (1) Notification of inspection. (2) Inspection results. Submit a copy of the inspection record (required in §63.1065) when inspection failures occur. (3) Requests for alternate devices. If requesting the use of an alternate control device, submit a written application including emission test results and an analysis demonstrating that the alternate device has an emission factor less than or equal to the device specified in §63.1063. (4) Requests for extensions. If elected to use an extension in accordance with §63.1063(e)(2), or §63.1063(c)(2)(iv)(B), submit the applicable documentation. For §63.1063(e)(2), documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical. For §63.1063(c)(2)(iv)(B), documentation of a decision to use an extension shall include an explanation of why it was unsafe to perform the inspection, documentation that alternative storage capacity is unavailable, and a schedule of actions that will ensure that the vessel will be emptied as soon as practical. [§63.1066(b)]	There are currently no Group 1 Storage Tanks equipped with an internal or external floating roof.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Group 1 Process Wastewater		
21	For each waste management unit that receives, manages, or treats a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream, submit the results of each inspection (e.g. initial, semiannual / annual – See Table 11 to Subpart G) required by §63.143(a) in which a control equipment failure (as defined in §63.133 through §63.137) was identified. Include the date of the inspection, identification of each waste management unit in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made. [§63.146(c)]	No control equipment failures or improper work practices were identified during the semiannual inspection of the applicable waste management units that receive, manage, or treat MON Group 1 Wastewater. In addition, no cracks or gaps were identified during the semiannual inspection of the MON Group 1 Wastewater individual drain system. Any other applicable event discovered during the reporting period is listed in Table II or III.
22	*Except as provided in paragraph (f) of this section* — for each treatment process used to comply with §63.138(b)(1), (c)(1), (d), (e) , (f), or (g), include the following information for monitoring required by §63.143(b), (c), and (d): (1) For Item 1 in Table 12, submit the results of measurements that indicate the biological treatment unit is outside the range established in the Notification of Compliance Status or operating permit. (2) For Item 2 in Table 12, submit the monitoring results for each operating day during which the daily average value of a continuously monitored parameter is outside the range established in the Notification of Compliance Status or operating permit. (3) For Item 3 in Table 12 of this subpart, submit the monitoring results for each operating day during which the daily average value of any monitored parameter approved in accordance with §63.151 (f) was outside the range established in the Notification of Compliance Status or operating permit. [§63.146(d)]	For the Group 1 Wastewater Streams discharged from the OXO Alcohol MCPU (M-46i and M-46ii), BRCP has elected to comply with §63.138(f) [required mass removal (RMR) option for open biological treatment processes], which is Item 1 in Table 12. Items 2 and 3 in Table 12 are not currently applicable to this site. The biological treatment unit (i.e. the UNOX Reactors) was not outside the range established in the Notification of Compliance Status. ♦ Daily average flowrate through North UNOX Reactor Train was ≤ 5230 gpm during this compliance period. This demonstrates that the reactors were thoroughly mixed. ♦ Daily average flowrate through South UNOX Reactor Train was ≤ 5230 gpm during this compliance period. This demonstrates that the reactors were thoroughly mixed. ♦ Monthly average MLVSS (mixed liquor volatile suspended solids) in the North UNOX Reactor Train was > 1000 mg/l during this compliance period. ♦ Monthly average MLVSS (mixed liquor volatile suspended solids) in the South UNOX Reactor Train was > 1000 mg/l during this compliance period. These criteria demonstrate that the reactors meet the definition of an enhanced biological treatment process per 40 CFR §63.111.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Heat Exchange Systems		
23	Information regarding any delay of repairs for heat exchange systems. [§63.104(f)(2)]	No leaks were detected in any heat exchange system subject to the requirements of 40 CFR 63, Subpart F at MON MCPUs that required the use of the delay of repair provisions during the reporting period.
Equipment Leaks		
24	Information required by 40 CFR 63, Subparts H or UU regarding equipment leaks. [§63.182(d), §63.1039(b)]	Applicable information for MON equipment subject to Subparts H or UU was submitted with the LDAR Semiannual Report in September 2021. For reference, the applicable information is also included as Table V.
Closed-Vent Systems / Control Devices		
25	For closed vent systems subject to the requirements of §63.983, include the following information, as applicable: ◆ The date the leak was detected and the date of the first attempt to repair the leak. ◆ The date of successful repair of the leak. ◆ The maximum instrument reading measured by the procedures in §63.983(c) after the leak is successfully repaired or determined to be nonrepairable. ◆ "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. [§63.999(c)(2)(i)]	No leaks were discovered during inspections of applicable closed-vent systems in the reporting period.
26	For closed vent systems subject to the requirements of §63.983, include the times and durations of all periods recorded when the vent stream was diverted from the control device through a bypass line. [§63.999(c)(2)(ii), §63.998(d)(1)(ii)(A)]	There were no known periods – except any applicable event listed in Item No. 27 (pg.12), Table II or Table III – recorded when a vent stream at BRCP required to be controlled by 40 CFR 63, Subpart FFFF was diverted from a control device to the atmosphere through a bypass line during the reporting period.

TABLE I
MON Reporting Requirements

No.	Reporting Requirement	Response
Closed-Vent Systems / Control Devices, continued		
27	For closed vent systems subject to the requirements of §63.983, include all periods recorded in which maintenance was performed on car-sealed valves, the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line was checked out. [§63.999(c)(2)(iii), §63.998(d)(1)(ii)(B)]	There were no time periods where maintenance was performed on applicable car-sealed valves, an applicable seal mechanism was broken, or an applicable bypass line was checked out during the reporting period.
28	For flares subject to the MON, report all periods when all pilot flames were absent or the flare flame was absent as recorded in §63.998(a)(1)(i)(C). [§63.999(c)(3)]	There were no known periods in which all pilot flames for a flare used as a control device for a Group 1 MON Emission Point at BRCP were absent during the reporting period that were not reported in Table III.
Alternative Compliance Requirements		
29	*For any alternative **control** device used:* Performance test report. [§63.995(b)]	BRCP is not currently using any alternative control devices to comply with the MON.
30	*For any alternative **recovery** device used:* Description of planned monitoring, recordkeeping, and reporting. [§63.993(c)(4), §63.995(c)]	BRCP is not currently using any alternative recovery devices to comply with the MON.
31	*For reduced recordkeeping program:* Notification of decision to use the alternative recordkeeping program for a continuous monitoring system(s). Include the information specified in §63.998(b)(5)(ii). [§63.998(b)(5)(i) and §63.999(c)(6)(iv), §63.999(b)(5)]	The alternative recordkeeping program in §63.998(b)(5) is not currently being used to demonstrate compliance at BRCP.
32	*For alternative monitored parameters:* Proposed alternative monitored parameters. [§63.996(d)(2), §63.999(d)(2)]	BRCP is not currently using any alternative monitored parameters to comply with the MON.
33	*For any other alternative monitoring or recordkeeping:* Proposed alternatives to the continuous parameter monitoring and recordkeeping provisions. [§63.996(d)(1), §63.999(d)(1)]	BRCP is not currently using any proposed alternatives to the continuous monitoring or recordkeeping provisions to comply with the MON.

Table II
MON Startups/Shutdowns/Malfunctions with Excess Emissions*

MCPU	ID	Event Type	Approximate Duration	Event Description*	Total Source Operating Time (Hours)
OXO Alcohol	T-696	Malfunction	0.28 days	On February 16, 2021, BRCP OXO Tankfield (2393-V4) VRS experienced exceedingly high suction pressure as a result of a frozen line from gas collection. The safety valves lifted releasing 4544.87 lb methane and 26.13 lbs hydrocabrons to the atmosphere. The compressors were shut down to minimize emissions, venting hydrocarbons to the atmosphere. Only 26.13 lbs of hydrocarbons (tetramer and heptene) were released as a result. The total of 4571 lbs is below the reportable quantity (RQ) of 5000 lbs.	4344
OXO Alcohol	T-696	Malfunction	0.02 days	On April 10, 2021, BRCP OXO Tankfield (2393-V4) VRS compressors tripped during severe thunderstorms as T670 experienced an upset at 5:50am, venting through an overhead line to the VRS and simultaneously the condenser flooded and the pump's strainer plugged. The PV vents lifted releasing 422.87 lbs of methane and 208.89 lbs of hydrocarbons (tetramer and heptane) to the atmosphere. The strainers were cleaned and the pumps and compressors were brought back online within 22 minutes. The total 631.77 lbs is below the reportable quantity (RQ) of 5000 lbs.	4344
OXO Alcohol	T-696	Malfunction	0.04 days	On May 1, 2021, BRCP OXO Tankfield (2393-V4) VRS compressors tripped as a result of a high level alarm in the vapor recovery suction drum (D-900) which triggered the high level cutoff. The level instrument read the level incorrectly and this instrument does not have a history of false readings. The PV vents lifted releasing 78.63 lbs of methane and 38.84 lbs of hydrocarbons (tetramer and heptene) to the atmosphere. The level instrument was fixed and the compressors were brought back online after 63 minutes. The total 117.47 lbs is below the reportable quantity (RQ) of 5000 lbs.	4344

*Event Description includes cause and/or corrective action as applicable, in accordance with §63.2520(e)(5)(ii)(B). Note that as described on *Page 1, Item 3*, events on this page meet the definition of *deviation* in §63.2550 but are not deviations in accordance with 40 CFR Part 70.

Table III
MON Deviations

MCPU	ID	Discovery Date	End Date or Duration	Event Description*	Total Source Operating Hours
None					

*Event Description includes cause and/or corrective action as applicable, in accordance with §63.2520(e)(5)(ii)(B).

Table IV
MON Source Operating Hours
40 CFR 63.999(c)(1)

Vent ID	Equipment ID	Equipment Classification	MCPU	Control Device	Total Source Operating Hours
V-475	Neo Acid Reactor System	Group 1 Continuous Process Vent	C5/C10 Neo Acids and C7 Neo Acids	BRCP Flare System	3930
V-476	ECT-10 / ECT-11	Group 1 Continuous Process Vent	C5/C10 Neo Acids and C7 Neo Acids	BRCP Flare System	3629
V-477	EFT-70 / EFD-01	Group 1 Continuous Process Vent	C5/C10 Neo Acids and C7 Neo Acids	BRCP Flare System	3865
V-279	Feed Preheater & Quench Drum (BXE-01/BXD-01)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280i	Fractionator System (BXT-01/BXE-06)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280ii	DCP Dimer Vent (BXE-07/BXD-18)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280iii	DCP Dimerizer Drum (BXD-06)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280iv	Fractionator Condenser (BXE-09)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280v	Fractionator Condenser Pot (BXD-14)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-280vi	Dimerizer Water Drum (BXD-07)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-483	Ropo Stripper Tower (BXT-02/XE-16/BXD-13)	Group 1 Continuous Process Vent	CPLA	BRCP Flare System	0
V-297i	Toluene Tower (BFT-01/BFE-101/BFD-101)	Group 1 Continuous Process Vent	DARLA	BRCP Flare System	0
V-297ii	VCH Tower (BFT-02/BFE-201/BZE-501)	Group 1 Continuous Process Vent	DARLA	BRCP Flare System	0
V-297iii	VCH Tower (BFT-03/BFE-301)	Group 1 Continuous Process Vent	DARLA	BRCP Flare System	0
V-488	Spent Catalyst Stripper (BCD-301)	Group 1 Continuous Process Vent	DARLA	BRCP Flare System	0
V-492i	Extractive Distillation Tower (BDT-02/BDE-03)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-492ii	Stripper Tower (BDT-04/BDCD-05)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-492iii	Stripper Tower Reflux Drum (BDD-04/BDCD-05)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-492iv	Extractive Distillation Tower (BDT-09X/BDCD-19)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-492v	Distillation Tower Reflux Drum (BDD-12)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-492vi	Product Fractionator Tower (BDT-08X/BDCD-08/BDD-08)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	0
V-495i	Extractive Distillation Tower Reflux Drum (BDD-03/BDE-03)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-495ii	ACN Stripper Tower (BDT-11/BDE-253)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344
V-495iii	ACN Tower Reflux Drum (BDD-14)	Group 1 Continuous Process Vent	DILA	BRCP Flare System	4344

Table IV
MON Source Operating Hours
40 CFR 63.999(c)(1)

Vent ID	Equipment ID	Equipment Classification	MCPU	Control Device	Total Source Operating Hours
V-11	GT-01 / GT-02	Group 1 Continuous Process Vent	HCD	BRCP Flare System	3430
V-290i	WGT-01 / WGD-01	Group 1 Continuous Process Vent	IPA	BRCP Flare System	4343
V-290ii	WGT-02	Group 1 Continuous Process Vent	IPA	BRCP Flare System	4342
V-392	WGT-03 / WGD-08	Group 1 Continuous Process Vent	IPA	BRCP Flare System	4343
T-1763	IPA Product Storage Tank	Group 1 Storage Tank	IPA	BRCP Flare System	0
V-314	Base OXO Oxonation Reactor System	Group 1 Continuous Process Vent	OXO Alcohol	Flare #7	182
V-317	XDD-410 / XDT-411	Group 1 Continuous Process Vent	OXO Alcohol	F-960 or Flare #7	4001
V-408	Demet Offgas	Group 1 Continuous Process Vent	OXO Alcohol	F-960 or Flare #7	3969
V-400i	Base OXO Hydrogenation Reactor System XHD-590 / XHD-595 Vent	Group 1 Continuous Process Vent	OXO Alcohol	Flare #7	186
V-400ii	Base OXO Hydrogenation Reactor System XHD-596 Vent	Group 1 Continuous Process Vent	OXO Alcohol	F-960 or Flare #7	4258
V-315i	XPT-710	Group 1 Continuous Process Vent	OXO Alcohol	F-635	4111
V-315ii	XPT_740	Group 1 Continuous Process Vent	OXO Alcohol	F-635	4343
V-405i	XPT-770	Group 1 Continuous Process Vent	OXO Alcohol	F-960	3233
V-405ii	XPT-780	Group 1 Continuous Process Vent	OXO Alcohol	F-960	3197
T-867	Tank 867	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-916	Tank 916	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-956	Tank 956	Group1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-974	Tank 974	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-975	Tank 975	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-976	Tank 976	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-979	Tank 979	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344

Table IV
MON Source Operating Hours
40 CFR 63.999(c)(1)

Vent ID	Equipment ID	Equipment Classification	MCPU	Control Device	Total Source Operating Hours
T-988	Tank 988	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
T-973	Tank 973	Group 1 Storage Tank in alternate C7/C8 Stabilizer Overhead service	OXO Alcohol	BRRF Fuel Gas System	4344
T-972	Tank 972	Group 1 Storage Tank in alternate C7/C8 Stabilizer Overhead service	OXO Alcohol	BRRF Fuel Gas System	Not a Group 1 Tank during reporting period
T-952	Tank 952	Group 1 Storage Tank	OXO Alcohol	BRRF Fuel Gas System	4344
V-457	T-620	Group 1 Continuous Process Vent	OXO Olefin Alternate Operating Scenario	#7 Flare	0
V-407	T-630	Group 1 Continuous Process Vent	OXO Olefin Alternate Operating Scenario	#7 Flare	0
V-458	T-640	Group 1 Continuous Process Vent	OXO Olefin Alternate Operating Scenario	#7 Flare	0
T-696	Tank 696	Group 1 Storage Tank	OXO Olefins	BRRF Fuel Gas System	4344
T-906	Tank 906	Group 1 Storage Tank	OXO Olefins	BRRF Fuel Gas System	4344
T-791	Tank 791	Group 1 Storage Tank in alternate C7/C8 Stabilizer Overhead service	OXO Olefins	BRRF Fuel Gas System	Not a Group 1 Tank during reporting period
T-3024 / T-3025	MD-01A / MD-01B	Group 1 Batch Vent	Resins	BRCP Flare System	4335
V-352	IR-01 / JR-01 / JD-03	Group 1 Batch Vent	Resins	BRCP Flare System	4335
V-294iii	CR-01	Group 1 Continuous Process Vent	Resins	BRCP Flare System	3070
V-294i	AT-01 / AE-05	Group 1 Continuous Process Vent	Resins	BRCP Flare System	3306
V-294ii	BT-01 / BD-01	Group 1 Continuous Process Vent	Resins	BRCP Flare System	1542
V-294iv	DT-01 / DD-07	Group 1 Continuous Process Vent	Resins	BRCP Flare System	3070

Table IV
MON Source Operating Hours
40 CFR 63.999(c)(1)

Vent ID	Equipment ID	Equipment Classification	MCPU	Control Device	Total Source Operating Hours
V-353i	JD-02	Group 1 Continuous Process Vent	Resins	BRCP Flare System	4335
V-353ii	KT-01A	Group 1 Continuous Process Vent	Resins	BRCP Flare System	4343
V-353iii	KT-03 / KD-03	Group 1 Continuous Process Vent	Resins	BRCP Flare System	4343
T-1305	Tank 1305	Group 1 Storage Tank	Resins	BRCP Flare System	4343
T-1306	Tank 1306	Group 1 Storage Tank	Resins	BRCP Flare System	4343
T-1309	Tank 1309	Group 1 Storage Tank	Resins	BRCP Flare System	4343
T-1955	Tank 1955	Group 1 Storage Tank	Resins	BRCP Flare System	4343
V-219	WBT-03 / WBT-04	Group 1 Continuous Process Vent	SBA	BRCP Flare System	0
V-220	WJT-01	Group 1 Continuous Process Vent	SBA	BRCP Flare System	0
V-221	WJT-03	Group 1 Continuous Process Vent	SBA	BRCP Flare System	0
NA	BRRF Fuel Gas System	Control Device	NA	NA	4344
M-04, M-06, M-07, M-08	BRCP Flare System	Control Device	NA	NA	4344
M-17A	Flare #7	Control Device	NA	NA	4344
S-58	F-635	Control Device	NA	NA	4209
S-75	F-960	Control Device	NA	NA	4343
M-83	AWT UNOX Reactor System	Treatment Device	NA	NA	4344

Table V
MON LDAR Information

Submitted as part of
Consolidated Fugitive Emission Program
Semiannual Report
September 2021

Attachment I
EXXONMOBIL
Baton Rouge Chemical Plant
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January 1, 2021 to June 30, 2021

Regulatory Reference		VALVES						
	§63.1039(b)(4)	§63.1039(b)(1)(i) & (2)					§63.1039(b)(1)(i)	§63.1039(b)(1)(i)
MCPU/Permit #	PRV'S MONITORED	Total Monitored	Actual Leaks	Carryover >1%	Delay of Repair this Period	Reason	% Leaking with Carryover >1%	Rolling Average
CPLA								0.00%
2367-V4								
DILA BACKEND	2	3223	8	0	1	T/A	0.25%	0.48%
2367-V4								
HEARTCUT		346	0	0	0	NA	0.00%	0.09%
1911-V5								
NEOACID		2287	8	0	0	NA	0.35%	0.25%
2379-V2								
IPA		2674	8	0	0	NA	0.30%	0.63%
1924-V6								
RESINS	10							0.48%
2367-V7								
OXO ALCOHOL	15	5717	5	0	0	NA	0.09%	0.16%
2365-V8								
OXO OLEFINS	2	769	5	0	0	NA	0.65%	0.44%
2365-V8								
PHTHALATE ESTER	5	662	0	0	0	NA	0.00%	0.00%
2320-V4								
POLY	2	2831	17	0	0	NA	0.60%	0.41%
2396-V3								
NOVA		244	1	0	0	NA	0.41%	0.16%
2123-V4								

T/A = Technically infeasible to repair without a unit shutdown.

If no data present, there was no regulatory required monitoring for this period.

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Regulatory Reference		PUMPS						
		§63.1039(b)(1)(ii) & (2)					§63.1039(b)(1)(ii)	
MCPU/Permit #	Month Monit.	Total Monit.	Total Leaks	Visible Leaks[1]	Delay of Repairs	Reason	% Leaking	Rolling Avg.
CPLA	JAN	1	0	0	0	NA	0.00%	0.00
2367-V4	FEB	1	0	0	0	NA	0.00%	0.00
	MAR	1	0	0	0	NA	0.00%	0.00
	APR	1	0	0	0	NA	0.00%	0.00
	MAY	1	0	0	0	NA	0.00%	0.00
	JUN	1	0	0	0	NA	0.00%	0.00
DILA BACKEND	JAN	62	0	0	0	NA	0.00%	0.27%
2367-V4	FEB	62	0	0	0	NA	0.00%	0.27%
	MAR	62	0	0	0	NA	0.00%	0.27%
	APR	61	0	0	0	NA	0.00%	0.00%
	MAY	59	1	0	0	NA	1.69%	0.27%
	JUN	60	0	0	0	NA	0.00%	0.27%
HEARCUT	JAN	12	0	0	0	NA	0.00%	0.00
1911-V5	FEB	12	0	0	0	NA	0.00%	0.00
	MAR	12	0	0	0	NA	0.00%	0.00
	APR	12	0	0	0	NA	0.00%	0.00
	MAY	12	0	0	0	NA	0.00%	0.00
	JUN	12	0	0	0	NA	0.00%	0.00
NEOACID	JAN	28	0	0	0	NA	0.00%	0.01
2379-V2	FEB	28	0	1	0	NA	0.00%	0.01
	MAR	28	0	0	0	NA	0.00%	0.01
	APR	28	1	0	0	NA	3.57%	0.01
	MAY	28	0	0	0	NA	0.00%	0.01
	JUN	28	0	0	0	NA	0.00%	0.01
IPA	JAN	62	0	0	0	NA	0.00%	0.54%
1924-V6	FEB	62	0	0	0	NA	0.00%	0.27%
	MAR	61	0	0	0	NA	0.00%	0.27%
	APR	62	1	1	0	NA	1.61%	0.27%
	MAY	64	0	0	0	NA	0.00%	0.27%
	JUN	62	0	0	0	NA	0.00%	0.27%
RESINS	JAN	79	0	1	0	NA	0.00%	0.42%
2376-V7	FEB	80	0	0	0	NA	0.00%	0.42%
	MAR	80	0	1	0	NA	0.00%	0.42%
	APR	79	0	0	0	NA	0.00%	0.42%
	MAY	78	2	2	1	TOS	2.56%	0.63%
	JUN	78	0	0	0	NA	0.00%	0.63%

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OXO ALCOHOL	JAN	82	0	0	0	NA	0.00%	0.19%
2365-V8	FEB	82	0	0	0	NA	0.00%	0.19%
	MAR	82	0	0	0	NA	0.00%	0.19%
	APR	82	0	0	0	NA	0.00%	0.00%
	MAY	81	0	0	0	NA	0.00%	0.00%
	JUN	80	0	0	0	NA	0.00%	0.00%
OXO OLEFINS	JAN	5	0	0	0	NA	0.00%	0.00
2365-V8	FEB	5	0	0	0	NA	0.00%	0.00
	MAR	5	0	0	0	NA	0.00%	0.00
	APR	5	0	0	0	NA	0.00%	0.00
	MAY	5	0	0	0	NA	0.00%	0.00
	JUN	5	0	0	0	NA	0.00%	0.00
PHTHALATE ESTER	JAN	62	0	0	0	NA	0.00%	0.00%
2320-V4	FEB	62	0	0	0	NA	0.00%	0.00%
	MAR	62	0	0	0	NA	0.00%	0.00%
	APR	62	0	0	0	NA	0.00%	0.00%
	MAY	62	0	0	0	NA	0.00%	0.00%
	JUN	62	0	0	0	NA	0.00%	0.00%
POLY	JAN	41	1	1	0	NA	2.44%	0.80%
2396-V3	FEB	43	0	0	0	NA	0.00%	0.40%
	MAR	43	0	0	0	NA	0.00%	0.40%
	APR	43	1	0	0	NA	2.33%	0.79%
	MAY	42	0	1	0	NA	0.00%	0.79%
	JUN	40	1	2	0	NA	2.50%	1.19%

†May include HL pumps

	COMPRESSORS		
Regulatory Reference	**§63.1039(b)(4)**		
MCPU/Permit #	**Total Leaks**	**Delay of Repairs**	**Reason**
RESINS	0	0	NA
2376-V7			
IPA	0	0	NA
1924-V6			
OXO ALCOHOL	0	0	NA
2365-V8			

TOS = Equipment taken out of service and repaired.

T/A = Isolation/Repair not safe/feasible without a process unit shutdown (partial or complete). Repair will be accomplished before the end of the next scheduled unit shutdown.

Attachment I
EXXONMOBIL
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		AGITATORS			
Regulatory Reference		§63.1039(b)(1)(iv) & (2)			
MCPU/Permit #	Month Monit.	Total Monit.	Total Leaks	Delay of Repairs	Reason
NEOACID	JAN	3	0	0	NA
2379-V2	FEB	3	0	0	NA
	MAR	3	0	0	NA
	APR	3	0	0	NA
	MAY	3	0	0	NA
	JUN	3	0	0	NA
PHTHALATE ESTER	JAN	13	0	0	NA
2320-V4	FEB	13	0	0	NA
	MAR	13	0	0	NA
	APR	13	0	0	NA
	MAY	13	0	0	NA
	JUN	13	0	0	NA
NOVA	JAN	3	0	0	NA
2123-V4	FEB	3	0	0	NA
	MAR	3	0	0	NA
	APR	3	0	0	NA
	MAY	3	0	0	NA
	JUN	3	0	0	NA

TOS = Equipment taken out of service and repaired.
T/A = Isolation/Repair not safe/feasible without a process unit shutdown (partial or complete). Repair will be accomplished before the end of the next scheduled unit shutdown.

- **Change Log for August 2021**

The following changes were made to the MON NCS and included in the January 1, 2021 – June 30, 2021 Semi-annual Compliance Report:

The following revisions were made to the NCS:

Section I. MCPUs and Operating Scenarios

- **C5/C10 Neo Acid MCPU**
  - Updated Group 2 Surge Control Vessels Table to include Tank 1960

- **Cobalt Catalyst MCPU**
  - Updated MCPU to include increased number of batches and higher methanol percentage